

# **APPENDIX F**

## **RESPONSE TO PUBLIC COMMENTS**

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# 1. Introduction

During the public review and comment period for the Draft EIS and Proposed Land and Resource Management Plan, also referred to as the Prairie Plan, (May 7 through September 6, 2001), 62 responses were received from organizations, government entities, and private citizens. Six additional responses were received shortly after the close of the comment period. Because the review of public comment was still active, these late responses were included within the formal content analysis process. The Forest Service appreciates the time and effort expended by all respondents who participated in reviewing the planning documents. Segments of some letters appear in the following analysis to serve as examples of the public concerns expressed, but all letters were carefully read and considered by the Midewin planning team.

The USDA Forest Service Content Analysis Team (CAT) located in Missoula, Montana systematically analyzed all 68 responses. The Narrative Summary and the Public Concern List produced by the Content Analysis Team and all letters received are on file at the Prairie Supervisor's Office. Copies of the letters received from elected officials and government agencies are at the back of this document.

This document is organized under the general headings that mirror the EIS, "Purpose and Need/Comparison of Alternatives" and "Affected Environment and Environmental Consequences," since the environmental impact statement process is the means to refining a final land management plan. A few resource areas addressed in the draft document do not elicit distinct public comment or are only presented within the context of management for other resources. Therefore, to most accurately reflect public comment, the resource areas that generate the preponderance of response (Soil, Air and Water, Vegetation and Wildlife, and Recreation, etc.) serve as the organizational structure for consideration of all "Affected Environment and Environmental Consequences" topics.

The public concerns listed below are a detailed account of specific questions, problems, suggestions, or interests expressed by respondents to the Midewin documents. The Midewin Interdisciplinary Team prepared the Forest Service agency response to each public concern. Each public concern is followed by the respective agency response.

## 2. Purpose and Need

### PC #: 1

#### **Public Concern: The Prairie Plan objectives should tier to the Government Performance and Results Act.**

"Objectives should tier to GPRA (Government Performance and Results Act). These are goals and objectives that will be used to assess the performance of the Forest Service. Why weren't these used? Also, they are not worded as objectives. An objective should be measurable and have an element of timeliness. Project, manage, and enhance existing native vegetation remnants is not an objective (page 2-4) but a goal. Should be more specific (e.g. in the next 10 years), enhance 50% of the existing vegetation remnants." (U.S. Forest Service, No Address - #26)

#### **Agency Response:**

The Proposed Land and Resource Management Plan (Prairie Plan), tiers to the USDA Forest Strategic Plan (2000) which in turn is tiered to the Government Performance Review Act (Prairie

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Plan 1-3 and 2-1). In compliance with Forest Service Planning policy the Final Prairie Plan objectives have been revised to be measurable and with a time element.

**PC #: 2****Public Concern: The Prairie Plan should adhere to the Biodiversity Recovery Plan.**

“In general, we find your Plan and DEIS to be highly consistent with NIPC’s adopted regional plans and policies, especially the Biodiversity Recovery Plan. As NIPC and the Midewin National Tallgrass Prairie are members of Chicago Wilderness, we believe that your plan will greatly advance biodiversity restoration in this region. Congratulations on helping to bring these tremendous resources to northeastern Illinois. We are very pleased that you have referenced the Biodiversity Recovery Plan in your Plan. The Biodiversity Recovery Plan cites Midewin National Tallgrass Prairie as an example of a site that, once restored, is of sufficient size to support viable animal populations.” (Northeastern Illinois Planning Commission, Decatur, IL - #21)

**Agency Response:**

As a member of Chicago Wilderness (an alliance of 136 public and private organizations working to protect and manage the natural resources of the Chicago region), Midewin National Tallgrass Prairie embraces the Chicago Wilderness Biodiversity Recovery Plan objectives. The Prairie Plan outlines specific objectives, standards, and guidelines to enhance and manage dolomite prairie and grassland birds, two elements of the prairie ecosystem with biological significance to the Chicago region. The Final EIS examines the significance of managing habitat at Midewin for biological diversity (FEIS 3-78 and 3-100).

**PC #: 3****Public Concern: The Prairie Plan should reference the Regional Greenways Plan.**

“While the Plan presents a good mix of trail opportunities, the Plan should reference the Regional Greenways Plan, which includes the Midewin National Tallgrass Prairie as a component. The Wauponsee Trail is referenced, but there should also be mention of other stream greenways. Your Plan should strive to coordinate, or ‘match-up’ with the adjoining greenway proposals in the Regional Greenways Plan.” (Northeastern Illinois Planning Commission, Decatur, IL - #21)

**Agency Response:**

The 1997 Regional Greenways Plan prepared by the Northeastern Illinois Planning Commission and the Midewin Trail Plan (Openlands Project, 1996) outline basic trail concepts. These trail concepts were used early in the planning process at Midewin when issues and alternatives were being developed (Prairie Plan 1-3). The Prairie Plan trail corridors shown on Map Figure 6 indicate two locations where Midewin trails could connect to the Wauponsee Trail and one possible trail connection to the Des Plaines Conservation Area along River Road.

The Midewin National Tallgrass Prairie will continue to work cooperatively with regional and local outdoor recreation agencies and groups to plan actual trail routes that connect Midewin to other trail systems. The Forest Service’s management of Midewin National Tallgrass Prairie and other National Forests occurs at two levels. At the first level, the Forest Service develops the Prairie Plan, a broad, programmatic document accompanied by an Environmental Impact Statement. A public review process conducted in compliance with the National Environmental Policy Act (NEPA) provides a broad framework and overall management direction. At the second level, the Forest Service implements the Land and Resource Management Plan by approving (with or without modification) or disapproving particular “site-specific” projects. Each project proposal is subject to further public involvement and review under NEPA and the proposed projects must be

consistent with the Prairie Plan. The next steps for trail development will include detailed analyses and alternatives for specific trail locations. At that time, appropriate in-depth data will be gathered as the basis for arriving at informed decisions. Interested groups and individuals are encouraged to stay involved with planning at the project or site-specific level.

**PC #: 4****Public Concern: The Midewin National Tallgrass Prairie should coordinate planning and implementation efforts with government agencies, adjacent communities, and private organizations.**

"I would hope that Will County officials recognize the potential contribution of Midewin to the local economy and quality of life. Now would seem to be the time to coordinate planning decisions, set-backs, use restrictions, etc. with the County or adjacent communities to ensure the integrity of the 'Midewin experience.' Even incentives - to encourage use of 'green roof' technology on large flat-roofed industrial buildings, or densely planted hedgerows along abutting properties to protect park view ways - should be sold to officials as soon as possible." (Individual, Oak Park, IL - #32)

"TROD [Trail Riders of DuPage] has established an excellent, cooperative relationship with the operating staff of the DuPage County Forest Preserve to regularly review our mutual interest and concerns. To this end, the writer meets with an assistant director of operations on a regular monthly basis. We would propose that a similar effort with your personnel, could prove very beneficial for the best development of the new Tallgrass Prairie." (Recreational Organization-Non-Motorized, Naperville, IL - #56)

"Although staff had no outstanding issues regarding the Draft Prairie Plan itself, there was great interest in the future planning stages dealing with recreational opportunity. DNR [Illinois Department of Natural Resources] is particularly interested in participating in the decision making process leading to specific development and placement of compatible recreational opportunities. When the Midewin planning team begins this process, I would like to assign additional staff from our Forestry and Wildlife Divisions to provide DNR input." (Illinois Department of Natural Resources, West Chicago, IL - #38)

**Agency Response:**

As directed in the establishing legislation (Illinois Land Conservation Act), the Forest Service has encouraged participation of local, state, tribal, and other federal agencies, interested groups, and individuals during the planning process and intends to continue involvement of these groups through implementation of the Prairie Plan and monitoring results. In particular, the Forest Service has consulted with the Illinois Department of Natural Resources, the Forest Preserve District of Will County, and the US Fish and Wildlife Service. The Forest Service will continue to work cooperatively with these agencies, groups and entities throughout the next decade and beyond as the Prairie Plan is implemented through specific projects. As a cooperating partner, the Forest Service has contributed to various local and regional planning efforts including the Will County Land and Resource Management Plan, Will County Stormwater Ordinance, and Northeast Illinois Planning Commission. The Forest Service will continue to stay involved in local, county and regional planning efforts to provide information on the contribution that Midewin National Tallgrass Prairie can make to the local economy and quality of life, and the conservation of the biological diversity at Midewin. However, the Forest Service only has legislative authority over the land that was designated by Congress.

**PC #: 5****Public Concern: The Prairie Plan should address local standards and guidelines for land and resource management.**

"The Plan was prepared in accordance to national standards and guidelines, however local standards and guidelines should also be consulted. NIPC has prepared several model ordinances for northeastern Illinois, and the Plan should also refer to these standards and guidelines. For example, NIPC has model ordinances

for floodplains, storm water drainage and detention, soil erosion and sediment control, stream and wetland protection, and watershed management.” (Northeastern Illinois Planning Commission, Decatur, IL - #21)

### **Agency Response:**

After review of the model ordinances, we find that the technical content of these documents provide a sound and practical basis for protective planning. The ordinances can provide Midewin with easy-to-use references for Midewin and any contractors working on project implementation. The guides will better enable Midewin to meet or exceed regional standards for protection of soil and water resources. We have added two guidelines to our Prairie Plan that cite the ordinances on erosion and sediment control, stormwater management, and floodplain management, as well as the “Urban Manual,” as references to be used for protection of soil and water resources. This adjustment of the plan will make it easier for the Forest Service to meet or exceed local standards. The sections of the model ordinances that refer to adoption of the ordinance by a county or municipality, application and permit procedures, and enforcement by the jurisdiction are not applicable to Midewin.

We have chosen not to adopt the “Model Stream and Wetland Protection Ordinance” for the Prairie Plan. Midewin is strongly oriented toward wetland restoration, and we find that the protective nature of the model ordinance is not highly complementary to our plan. Some components of the ordinance may conflict with the Prairie Plan, particularly the fill of wetlands that will be necessary for some restoration projects, and some agricultural practices in riparian areas that we will use to obtain ecological objectives. We find that the protective contents of the ordinance is adequately represented in the Prairie Plan Standards and Guidelines as well as the Clean Water Act as enforced by the Corps of Engineers in the 404 program (Prairie Plan 4-6).

### **PC #: 6**

#### **Public Concern: The Midewin National Tallgrass Prairie should consult with private landowners and local government entities regarding adjacent land uses.**

“Although the adjacent lands are privately owned and under the jurisdiction of other governmental bodies, land use plans for adjoining areas and the NIPC Land Use Inventory should be consulted for neighboring land uses, which might explore possible buffer areas around Midewin National Tallgrass Prairie. In addition, there should be a process for working with local officials regarding adjacent land uses.” (Northeastern Illinois Planning Commission, Decatur, IL - #21)

### **Agency Response:**

The decisions made in the Record of Decision on the Prairie Plan for Midewin National Tallgrass Prairie only affect those lands administered by the USDA Forest Service. As a cooperating partner, the Forest Service has contributed to local and regional planning efforts including the Will County Land and Resource Management Plan, Will County Stormwater Ordinance, Chicago Wilderness Biodiversity Recovery Plan, and the Northeast Illinois Planning Commission. The Forest Service works closely to coordinate planning at Midewin and adjacent properties including the Illinois Department of Natural Resources, Will County, CenterPoint Properties at Deer Run Industrial Park, the Joliet Arsenal Development Authority, the cities of Wilmington and Elwood, and other private landowners. The Forest Service will continue to stay involved in local, county, and regional planning efforts to provide information on the contribution that Midewin can make to the local economy and quality of life, and to the conservation of biological diversity at Midewin. However, the Forest Service only has legislative authority over the land that was designated by Congress.

**PC #: 7****Public Concern: The Midewin National Tallgrass Prairie should limit land uses on Forest Service property adjacent to the Island City Industrial Park if land use edge restrictions are implemented.**

“Page E-5 Objective 8b. Define what you mean by land uses being edge restricted. Our concern is that we have a right to develop our property based upon the Illinois Land Conservation Act of 1995 USCAs 1609 (PL104-106, 1996 S 1124 Sec. 2897(c)), if there is a need for buffering or restricting of uses we would expect the U.S. Forest Service to limit their uses on the property adjacent to the Island City Industrial Park to prevent any negative effects.” (Joliet Arsenal Development Authority, Wilmington, IL - #43)

**Agency Response:**

The Prairie Plan outlines basic goals and objectives for research at Midewin in Appendix E- Research Needs and Opportunities (Prairie Plan. E-1 - E-6). Research Objective 8b: “Determine how land-use practices and development on the borders of Midewin influence restoration success, and determine to what extent such effects are edge-restricted.” In this context “edge-restricted” refers to a buffer area. Within this buffer area activities and development from neighboring properties such as industrial parks, landfills, national cemetery, and private property may have an effect on prairie restoration and other resources at Midewin. The intent of Research Goal 8 is to work with Midewin’s neighbors in a cooperative manner and to gather basic data to better understand how different land use practices affect prairie resources.

The decisions made in the Record of Decision on the Prairie Plan for Midewin National Tallgrass Prairie only affect those lands administered by the USDA Forest Service. However, recent experience with development at Deer Run Industrial Park on the west side of Midewin shows that industrial development does result in impacts offsite (i.e., on Midewin), and that careful cooperative planning efforts can mitigate negative impacts. As Midewin also lies adjacent to land set aside for the Island City Industrial Park, we expect to work closely with the Joliet Arsenal Development Authority or subsequent landowner(s) as development progresses.

**PC #: 8****Public Concern: The Midewin National Tallgrass Prairie should identify all land surrounding the Joliet Arsenal that is being considered for acquisition.**

“Figure 5. Scenery Management System Map. The area surrounding the arsenal including the area along Rt. 53 south of the Administration Building and the property along South Arsenal Road. Are these areas being considered for acquisition by the U.S. Forest Service or any entity to donate to the Midewin National Tallgrass Prairie? Obviously these properties are important considering the recent acquisition of the Russell Farm by Corlands to benefit the Midewin National Tallgrass Prairie. From a scenic integrity standpoint why have they not been included in your plan? . . . If the U.S. Forest Service has or is considering acquisition or is working with another entity to acquire property surrounding the Arsenal then why are those parcels not identified in your plan? JADA and the surrounding communities are opposed to any further acquisition of land in the area, for or by the U.S. Forest Service or any other entity that would take properties off the tax rolls.” (Joliet Arsenal Development Authority, Wilmington, IL - #43)

**Agency Response:**

To better understand the Prairie Plan Figure 5 “Scenery Management System Map”, also refer to Figure 7 “Land Ownership Map.” The small rectangular area bordered by Route 53 to the west and South Arsenal Road to the south is shaded brown, meaning that it is land still owned by the

Department of Defense. This is land that will be transferred to the USDA Forest Service, as legislated in the Illinois Land Conservation Act, Section 2916. The Final Environmental Impact Statement Chapter 1, Purpose and Need, Location and Description, states that “approximately 3,000 additional acres are legislated to be transferred to the Forest Service pending cleanup, and these areas have been included within the planning area, although these lands still remain under administration by the Department of Defense.” The Prairie Plan includes lands in this status and the total acreage for habitat restoration and scenery management, as shown on Prairie Plan maps, includes these parcels of land.

As authorized by the Illinois Land Conservation Act, other lands may be acquired for inclusion in the Midewin National Tallgrass Prairie by donation, purchase, or exchange on a willing seller basis only. Thus, the Prairie Plan provides for acquisition of future parcels with priority based on important or unique resources such as Threatened and Endangered species habitat, wetlands, cultural resource values, followed by important recreational values or lands needed to protect other values. The Prairie Plan states “any parcels transferred from the Department of Defense or acquired through donation, exchange or acquisition will be managed in accordance with this Prairie Plan without need for a plan amendment.” The Prairie Plan also states, “Only purchase lands on a willing seller/willing buyer basis, when exchange or donation is not feasible and when funds are available for purchase” (Prairie Plan 4-16). Private lands currently under negotiation for acquisition were not accounted for or displayed on Prairie Plan maps, as these transactions are not final and deeds have not been transferred.

The State of Illinois recently chose the Stabilization option under the Payment Stabilization to States Act. For the next six years, payments to counties will not fluctuate despite an increase or decrease of receipts from Forest Service land in Illinois.

#### **PC #: 9**

#### **Public Concern: The Midewin National Tallgrass Prairie should cooperate with adjoining property owners to develop conservation easements.**

“We’re looking at up to 40,000 acres of ‘Prairie Parklands.’ Cooperation with neighbors is critical. Conservation easements in perpetuity (tax break dollars) with adjoining farmers and industry are essential.” (Individual, Gurnee, IL - #29)

#### **Agency Response:**

The decisions made in the Record of Decision on the Prairie Plan for Midewin National Tallgrass Prairie directly affect only those lands administered by the USDA Forest Service. Midewin National Tallgrass Prairie is a key component of the Prairie Parklands, an expansive area of public, private and corporate lands in Will and Grundy counties that are significant for their native habitat conservation goals (Prairie Plan 1-6). Midewin has many neighbors, both public and private, and the Forest Service intends to continue to work cooperatively with adjoining landowners.

The Illinois Land Conservation Act Section 2914(d)(1) authorizes acquisition of “lands or interests therein for inclusion in the Midewin National Tallgrass Prairie . . . on a willing seller basis only.” The Prairie Plan states, “Only purchase lands on a willing seller/willing buyer basis, when exchange or donation is not feasible and when funds are available for purchase” (Prairie Plan 4-16). Conservation easements may be a tool to preserve and protect private land from further development, when acquisition is not a feasible alternative.

**PC #: 10****Public Concern: The Midewin National Tallgrass Prairie should prioritize goals for each section of the proposed plan to facilitate public involvement.**

“We recommend that the plan prioritize goals in each section. The goals should drive the budget, not the other way around. It would be appreciated if there could be public input into prioritization.”

(Preservation/Conservation Organization, IL - #49)

**Agency Response:**

The participatory approach to the planning process over the past five years has worked to set general priorities for Midewin. These priorities are reflected in the Land and Resource Management Plan Goals and Objectives (Prairie Plan 2-5 through 2-14). These goals are not further prioritized. The Prairie Plan is implemented through various site-specific projects, such as building a visitor/learning center, restoring a portion of the prairie or wetland, or constructing a trail. If the budget is less than full in any given year, the projects scheduled to implement the Prairie Plan for that year may have to be rescheduled. Restoration and development projects will be coordinated with the Army cleanup, which is on an 8 to 10 year schedule. Appendix F – Proposed and Probable Management Practices and Descriptions of Projects for Fiscal Years 2002 to 2006, describes the projects or activities the Forest Service will pursue over the next five years.

The Forest Service’s management of Midewin National Tallgrass Prairie occurs at two levels. At the first level, the Forest Service develops the Prairie Plan, a broad, programmatic document, accompanied by an Environmental Impact Statement with a public review process conducted in compliance with NEPA. The Midewin Prairie Plan provides a broad framework and overall management direction. At the second level, the Forest Service implements the Prairie Plan by approving (with or without modification) or disapproving particular “site-specific” projects. Each project proposal is subject to further public involvement and review under the National Environmental Policy Act and the proposed projects must be consistent with the Land and Resource Management Plan. Interested groups and individuals are encouraged to stay involved with planning at the site-specific level.

**PC #: 11****Public Concern: The Midewin National Tallgrass Prairie should reassess the level of detail presented within the proposed planning documents.**

“It is a daunting task to read through both of the . . . documents [Proposed Prairie Plan & DEIS] and make specific comments.” (Individual, Joliet, IL - #54)

“I confess to some disappointment and misgivings, as I interpret the proposed plan; an overkill of information (35 pages & over 600 prairie plant types) on proposed native vegetation restoration, which, in their existence, will be identifiable only to those whose Herculean efforts restored them - and those folks schooled in the appropriate sciences.” (Individual, Wilmington, IL - #59)

**Agency Response:**

The formats for Forest Service Land and Resource Management Plans and preparation of Environmental Impact Statements are outlined in federal laws, agency regulations, and policies. The legal burden of the Forest Service to examine the issues, analyze a reasonable range of alternatives, and adequately assess the effects results in lengthy Environmental Impact Statements for complex proposals such as Land and Resource Management Plans.

The Forest Service’s management of Midewin National Tallgrass Prairie occurs at two levels. At the first level, the Forest Service develops the Prairie Plan, a broad, programmatic document,



accompanied by an Environmental Impact Statement with a public review process conducted in compliance with the National Environmental Policy Act. The Midewin Prairie Plan provides a broad framework and overall management direction. The Prairie Plan will be used to guide future projects that will be further analyzed in detail at the site-specific level over the next decade. At the second level, the Forest Service implements the Prairie Plan by approving (with or without modification) or disapproving particular "site-specific" projects. Future environmental assessments and proposed projects will tier to or be based on both this Prairie Plan and Final EIS. Future managers and interested parties will need to use these documents as references. Each project proposal is subject to further public involvement and review under NEPA and the proposed projects must be consistent with the Land and Resource Management Plan. Interested groups and individuals are encouraged to stay involved with planning at the site-specific level.

We serve a large and diverse public, and to make these large documents more available to the public, they were produced and made available hard copy, on the Midewin web site and as a CD-ROM. Staff at Midewin have been available to answer questions as needed throughout the comment period. An executive summary of the EIS is also available on request from the Supervisor's Office for those who wish to be provided with a brief synopsis.

**PC #: 12****Public Concern: The Midewin National Tallgrass Prairie should continue to provide well-written text and balanced documentation in its planning efforts.**

"I would like to mention that both the DEIS and the Prairie Plan were well written considering the complexities involved. Both documents were understandable to the private citizen with a non-technical background. The documents provided an educational insight into the many considerations involved with Midewin restoration." (Individual, Tinley Park, IL - #25)

"It is nice to see that the plan successfully balanced topics based on availability of information. Places that have less information are given less space without all the BS'ing. It is nice that the document is based on science and FS precedent rather than conjecture or opinion. I bet it will stand its ground well." (Individual, Evergreen Park, IL - #41)

**Agency Response:**

The formats for Forest Service Land and Resource Management Plans and preparation of Environmental Impact Statements are outlined in federal laws, agency regulations and policies. We serve a large and varied public, and to make these large documents more available they were produced and made available hard copy, on the Midewin web site and on CD-ROM. An executive summary of the EIS is also available on request from the Supervisor's Office for those who wish to be provided with a brief synopsis.

**PC #: 13****Public Concern: The Final EIS should clarify the use of the term "reintroduction" as it applies to management actions.**

"Terminology. In various portions of the Plan and DEIS, the term 'reintroduction' is used to describe potential future management options for species. This term is widely misapplied in a similar fashion to describe a prescribed process by which individuals are placed in apparently suitable habitat, often for conservation purposes of single species. In the field on conservation biology, it is becoming more widely accepted to consider the standard English usage of the prefix 're-' in forming the term 'reintroduction.' This term is correctly applied only when describing an introduction of a species, which previously occurred only as a result of other human-mediated introduction. We suggest that future use of this term be carefully applied only in situations that meet the above criterion. Other alternative terms (translocation; population augmentation or enhancement; head-starting) may be more appropriate, depending upon the individual

circumstances or contexts in which they are intended. There are several places in the Plan and DEIS where these alternative terms are used, apparently in correct context. Careful future application of these terms could avoid potential confusion between MNTF and conservation biologists as well as with other public constituent groups.” (Individual, Carol Stream, IL - #55)

**Agency Response:**

While we agree that, wherever possible, the use of more specific terms is appropriate, unfortunately an overall term for the activity described does not appear to exist. The term “reintroduction” is often used for the various methodologies by which new populations of native organisms are established in suitable habitat. For example, in one published collection of case history and review papers, *Restoring Diversity* (Falk et al. 1996), three sections and nine chapters include “reintroduction” and “reintroducing” in their titles; even the subtitle for this volume is “Strategies for Reintroduction of Endangered Species”. (Falk et al. 1996), three sections and nine chapters include “reintroduction” and “reintroducing” in their titles; even the subtitle for this volume is “Strategies for Reintroduction of Endangered Species”.

Researchers have interpreted the term “reintroduction” narrowly and it has been used in reference to the re-stocking of non-native species. Perhaps the term “restoration” is more appropriate, and we do use this term as a “catch-all” in various places in the Prairie Plan. Wherever possible, we have replaced “reintroduction” with more precise terms.

We have included an additional Wildlife Management Guideline in the Prairie Plan to prohibit re-stocking or the introduction of non-native species for game management or recreation alone, and where it may not enhance prairie ecosystem functions (Prairie Plan 4-30).

**PC #: 160****Public Concern: The Final EIS should define the term “under cultivation” as it applies to crops and forage production.**

“2-4 Goal 2 (d)—‘Progressively reduce area under cultivation and initiate restoration to either grassland or native prairie habitat.’ ‘Under cultivation’ in this context appears to mean production of grain crops and not production of forage for livestock or grazing for management purposes. The term cultivation has not been previously defined in the Plan or in the DEIS Glossary (DEIS Chapter 8). Since ILCA, PL 104-106 specifically mentions grazing is a permitted agricultural activity, the term ‘under cultivation’ may need clarification to avoid lumping of grain crops and forage crops with cultivation.” (Individual, Dundee, IL – #66)

**Agency Response:**

In the Final EIS, the phrase “area under cultivation” has been replaced with “area in grain crops”. We have tried to eliminate any other usage of the term “cultivation” that might cause confusion.

**PC #: 14****Public Concern: The Final EIS should use terminology that reflects a clear distinction between harvest of domestic plants and hunting/gathering wild species.**

“In several places, the phrase ‘game and harvest wildlife’ is used. ‘Harvest wildlife’ is never defined. To me it means game—wild animals taken by hunting, fishing, or collecting (e.g. sessile marine species). ‘Harvest’ is properly restricted to plants grown by people. It’s strictly an agricultural word. To use this word in relation to wild animals or plants is to put a false face on hunting and gathering, to display shame to the dominant agricultural society. Enough is enough! Your style editor says: never use this term ‘harvest

wildlife' again! And don't talk about 'harvesting' wild animals and plants. We hunt, we fish, we collect, and we gather. 'Take' is a word hunters use. We can be sufficiently diplomatic in our speech without this pretense that we are not really hunting and gathering. The honest words also save words, ink, and paper." (Individual, Chicago, IL - #36)

### **Agency Response:**

"Harvest" is a commonly used term when referring to the total quantity of wildlife or wildlife products (such as individuals, pelts, or eggs) removed from free-living populations during a single season. The use of this term is commonly accepted in both scientific and technical literature for the fields of wildlife management, animal ecology, and conservation biology. We have added this definition to our glossary.

### **PC #: 15**

#### **Public Concern: The Midewin National Tallgrass Prairie should not reference evolutionary biology as a justification for prairie restoration.**

"Is there not a serious contradiction inherent in using evolutionary biology to justify any part of a restoration/preservation effort? Does such theory allow achieving and keeping frozen in time a particular past land/flora/fauna state? If evolutionary biology assumes change over time and tries to observe its effects, then a 'going backward' in time to make and keep static a relatively small demonstration prairie like a larger one of 160 years ago is a monumentally unnatural undertaking unlikely to be achieved. Just consider some factors which have changed significantly in those years that cannot be reversed, such as variations in air quality, water flow and availability, temperature changes due to extensive concrete use nearby, other surrounding land uses, and so on!" (Individual, Frankfort, IL - #51)

### **Agency Response:**

We find no contradiction in our use of references from evolutionary biology as a source of information on which to base our analysis. The behavior, ecology, and inter-relationships of all organisms are grounded in their evolutionary history. Our ability to protect, conserve, and enhance the populations of these organisms and their habitats (Illinois Land Conservation Act 1996, Sec. 2914.c.4) will depend, in part, on the variability and adaptability these organisms have inherited from their ancestors. Also, our ability to predict their responses to threats and management is based in part, on scientific knowledge and studies developed under the framework of evolutionary biology. Information about minimum habitat requirements for population viability, potential for dispersal of exotic organisms, and response of organisms to disturbance is based on peer-reviewed scientific studies, as directed by the Committee of Scientists (1999, pp. 121-125, 176).

Insights from evolutionary biology have provided understanding for antibiotic resistance in bacteria, invasions by non-native species, and other relevant issues. The preservation of prairie in a static condition is the opposite of what we propose. Instead we hope to restore a dynamic, functioning ecosystem that has sufficient resilience to respond to both biotic (e.g., invasive species) and abiotic (e.g., climatic change) challenges, as detailed in the FEIS under Biodiversity (3-72 to 3-101). This is opposed to the current condition, under which the situation for indigenous biodiversity is either static (i.e., depauperate examples encapsulated in tiny refuges) or in decline (extirpation or local extinction of many species). The historically rich diversity of unique organisms and their interactions is being replaced by a simpler system that is increasingly dominated by a few species that are widespread across several continents. Our society has made the decision to restore and sustain as much diversity as feasible for intrinsic, social, and economic reasons, as evidenced by Endangered Species Act, Executive Order 13112 (Invasive Species), the National Forest Management Act, and The USDA Forest Service Strategic Plan: 2000 Revision.

For more information please see: Committee of Scientists. 1999. Sustaining the People's Lands: Recommendations for Stewardship of the National Forests and Grasslands into the Next Century. United States Department of Agriculture. 193 pp.

**PC #: 16****Public Concern: The Final EIS should disclose realistic timeframes for project development and implementation.**

"The DEIS is void of any mention of the manner in which recreational trail use will progress and when. It is unfair to the public to state that the plan is for approximately 10 years and not to tell the public what development is realistic in one decade. Why can't the Supplementary DEIS set forth realistic time frames for projects? Most people would much rather know the truth than to be misled. If no trails will be on the ground for at least eight years, say so. If it will take 10 years to build a visitor's center, that expectation should be included." (Individual, Channahon, IL - #60)

**Agency Response:**

The participatory approach to the planning process over the past five years has worked to set general priorities for Midewin. These priorities are reflected in the Land and Resource Management Plan Goals and Objectives (Prairie Plan 2-5 through 2-14). The Recreation Objectives in the Prairie Plan were revised and now state the long-term objective of a variety of trail types, and also the objective for the next decade of approximately 10 miles of trails. Additionally, Appendix F – Proposed and Probable Management Practices and Descriptions of Projects for Fiscal Years 2002 to 2006, describes the projects or activities the Forest Service will pursue over the next five years. In particular the following projects are listed: Design and build a visitor center and design, construct, and maintain trails on the west side of Illinois Route 53 and outside the security fence (Prairie Plan, Appendix F-2).

**PC #: 17****Public Concern: The Final EIS should disclose cost estimates for the proposed management actions.**

"No mention of cost estimates can be found in the DEIS. As a public agency funded by tax dollars, I firmly believe a frank discussion of the cost of various aspects of the plan should be openly included. If the cost of various aspects are expected to be high and difficult to fund, please tell us, and not let us believe that it will happen without special or extraordinary funding. The public does not like to be lied to or misled." (Individual, Channahon, IL - #60)

**Agency Response:**

Forest Service Planning Regulations 36 C.F.R. §219 require that each alternative considered in detail shall have an estimate and comparison of economic effects. The Final Environmental Impact Statement (FEIS) presents a summary of Present Net Value by alternative in Chapter 3 pp. 3-249 and 3-250. The FEIS, Appendix E, Documentation of Analysis pages E-2 through E-6, discloses the Cost-Benefit Analysis and Calculation of Present Net Value for each alternative for Facilities Removal, Roads, Agricultural Lease Revenues, Habitat Restoration and Maintenance, and Recreational Facilities Construction and Maintenance.

**PC #: 18****Public Concern: The Prairie Plan should address how research activities will be coordinated among diverse scientific institutions.**

“Midewin presents an opportunity to do research relevant to issues as diverse as land/atmosphere gas exchange, changes in the carbon/nitrogen/sulfur cycle associated with prairie restoration, the evolutionary biology of related habitat changes (e.g., from grassland to prairie to savanna). How will the issue of coordination of such research across a range of institutions (universities, private industry, federal laboratories) be addressed?” (Individual, No Address - #1)

**Agency Response:**

Direction in the Forest Service planning regulations for research 36 C.F.R. §219.28 requires forest plans to identify research needs with particular attention to those research needs identified during monitoring and evaluation. The Illinois Land Conservation Act established Midewin with four purposes, one of which is to provide opportunities for scientific, environmental, and land use education and research. At the present, the Forest Service at Midewin is cooperating with 10 partners from universities, private industry, and other organizations for specific research projects, and welcomes the opportunity to work with additional parties interested in research of diverse and relevant topics at Midewin. No formal protocol or process to submit research proposals has been established. However, those interested in research at Midewin need only to contact the staff at Midewin and submit a preliminary proposal to the Prairie Supervisor to be considered. The Forest Service at Midewin does not grant research funds, but does approve of research projects that meet the intent of the establishing legislation and meets the needs of both Midewin and the researcher.

**PC #: 159****Public Concern: The Midewin National Tallgrass Prairie should accommodate research comparisons of restoration techniques and management strategies.**

“Midewin presents a magnificent opportunity for applied research, especially in the areas of community restoration, population dynamics, predator prey relationships, the role of keystone predators, deer herd management and pollination ecology to name a few. The site should make accommodations for research comparisons of various restoration techniques and management strategies. Midewin also provides the rarest of opportunities to monitor and research the effects of introducing recreational activities on a site where there was previously none. This is a truly extraordinary opportunity for biologists, social scientists and outdoor recreational researchers to analyze the impacts of the various recreational pursuits such as hiking, trail riding, camping, etc. over time as they are allowed. This would provide an excellent method and documentation to resolve conflicts between recreational impacts and natural resource protection. The Illinois Natural History Survey is eager to assist the Forest Service in all areas of research and monitoring at Midewin.” (Illinois Natural History Survey, Champaign, IL – #67)

**Agency Response:**

The Forest Service appreciates your comments and offer for continued assistance. The Land and Resource Management Plan, Appendix E, Research Needs and Opportunities was developed in cooperation with the Illinois Natural History Survey. Several goals for research at Midewin include research on effective restoration strategies and techniques. Several objectives relate to the effects of recreational activities on natural resources. Knowledge gained and lessons learned from research results at Midewin will be incorporated into future management plans and management activities.

**PC #: 19****Public Concern: The Prairie Plan should address the needs of independent scientific research and set aside sufficient portions of land for such uses.**

“We believe that, because of its large size and natural features, Midewin provides a unique opportunity for outstanding research institutions in the region to apply modern experimental approaches in ecological research that require land areas larger than 1,000 hectares. The DEIS failed to analyze the impacts of alternative configurations for setting aside a portion of the land area for such research activities. The impact analysis should also have considered specific issues of ecological scale (how much land is needed to conduct meaningful studies), support facilities, access, restricted public access, and appropriate research activities. A component of the impact analysis should have addressed the educational benefits and opportunities of a research program that includes graduate-student-directed research and study. In this regard, I feel that you are remiss in meeting one of the four basic purposes for establishing the Midewin National Tallgrass Prairie, i.e., ‘to provide opportunities for scientific, environmental, and land use education and research.’ Appendix E of the Prairie Plan discusses research needs and the goals and objectives of research at Midewin. However, it appears to be limited to research that will be conducted by the Forest Service and/or the Illinois DOC. There is no mention of the opportunity or the process by which researchers from the outstanding research institutions in the region can gain access to the Midewin National Tallgrass Prairie.” (Argonne National Laboratory, Lemont, IL - #19)

**Agency Response:**

Direction in the Forest Service planning regulations for research (36 C.F.R. §219.28) requires forest plans to identify research needs with particular attention to those research needs identified during monitoring and evaluation. The Illinois Land Conservation Act established Midewin with four purposes, the second purpose being to provide opportunities for scientific, environmental, and land use education and research. The Final EIS lists Environmental Education and Research Opportunities as an issue to be addressed based on the purposes for Midewin and public input. While recognizing the keen interest, the unique opportunity, and the legal responsibility for research, the planning team decided that no special land allocation was needed to designate a portion of Midewin entirely to research (FEIS 1-13). All of Midewin could be the subject of various research projects, whether environmental resource based or socio-economic based research. Thus each alternative to the Prairie Plan provides for education and research opportunities. The Prairie Plan Appendix E, Research Needs and Opportunities outlines both broad and specific research needs at Midewin. It includes a discussion of research that may be conducted at Midewin through Special Use permits by individuals, or through a Memorandum of Understanding or other type of agreement with Research Cooperators.

At the present, the Forest Service at Midewin is cooperating with 10 partners from universities, private industry, and other organizations for specific research projects, and welcomes the opportunity to work with additional parties. No formal protocol or process to submit research proposals has been established. However, those interested in research at Midewin need only to contact the staff at Midewin and submit a preliminary proposal to the Prairie Supervisor to be considered. The Forest Service at Midewin does not grant research funds, but does approve of research projects that meet the intent of the establishing legislation and meets the needs of both Midewin and the researcher.

**PC #: 20****Public Concern: The Midewin National Tallgrass Prairie should expand Research Oversight Committee membership to include environmental scientists from local universities.**

“My concerns relate to the implementation of the ROD as it relates to restoration planning and research opportunities. Please have the foresight so that when you begin your restoration activities, you do so in a manner that does not preclude future research. For example, keep in mind the need for replication and control sites. The best way to insure that this is accomplished is through your Research Oversight Committee. You have identified membership as the Forest Service, IDNR and the FS North Central Experiment Station. I would recommend that you expand the membership to include experts from the surrounding universities. This should include plant ecologists, wildlife biologists, and soil scientists as well as other disciplines pertinent to a prairie environment. This reconfigured committee would be invaluable in insuring that restoration proceeds in a fashion that will be conducive to future research at Midewin. I would recommend that this committee also conduct the periodic review of the Research Plan as noted in Appendix E.” (Individual, Lemont, IL - #15)

**Agency Response:**

The Prairie Plan outlines both broad and specific research needs at Midewin (Prairie Plan Appendix E). The Prairie Plan places less emphasis on the number of programs that will be implemented, with the realization that we need to be more adaptable to changing conditions and personnel. The paragraph in the Proposed Prairie Plan that refers to the Research Committee has been deleted. However, we do plan to initiate a research committee that includes experts from surrounding universities in order to be more effective in developing a sound, dynamic research program at Midewin and creating more awareness and interest in research opportunities. As restoration projects are proposed, we will consider opportunities to conduct research.

**PC #: 21****Public Concern: The Midewin National Tallgrass Prairie should hasten implementation of the preferred alternative for its benefits to visitor enjoyment and the natural environment.**

“Forest Service researchers, staff, and managers should be congratulated on developing a good plan that balances the various goals and objectives of different interests. IOS [Illinois Ornithological Society] recommends quick approval of the plan and a rapid transition into implementation so that the public can enjoy the tremendous improvements to Midewin that will result from its full implementation. More importantly, implementation will greatly improve the natural environment and increase natural habitat and grassland bird populations.” (Preservation/Conservation Organization, Lake Forest, IL - #62)

**Agency Response:**

The Prairie Plan provides the broad framework under which the restoration projects and programs will be implemented. The Forest Service did not wait until completion of the Prairie Plan, but proceeded with initial management activities as authorized by the Illinois Land Conservation Act soon after the land was transferred. Transition into plan implementation should not be difficult, as the early projects were developed under similar principles and objectives of habitat restoration for grassland birds and other sensitive species as our current plan. With Prairie Plan implementation habitat restoration will continue, and new opportunities for outdoor recreation on the prairie will be realized.

### 3. Comparison of Alternatives

**PC #: 22****Public Concern: The Midewin National Tallgrass Prairie should not select Alternative 1.**

“Alternative 1 is unacceptable. Maintaining existing conditions and programs on site severely limits available natural habitat and will eventually lead to deterioration of existing habitats and losses of bird populations. Alternative 1 also severely limits the potential ecological significance of the site and provides inadequate opportunity for public education and recreation.” (Preservation/Conservation Organization, Lake Forest, IL - #62)

**Agency Response:**

Inclusion of a No Action Alternative in an environmental impact statement is a requirement of the Council on Environmental Quality regulations for implementing the National Environmental Policy Act (NEPA) of 1969, as amended. The No Action Alternative serves as a baseline from which to compare the impacts of the action alternatives (Alternatives 2, 3, 4, 5, and 6 in the Midewin Prairie Plan).

While fulfilling the role of comparative baseline, the No Action Alternative is a legally required alternative that could be selected. However, as discussed in Chapter 3 of the FEIS, implementation of the No Action Alternative would allow the continuation of a number of current adverse impacts such as infestations of invasive plants and decreases in the quality and quantity of grassland, wetland, woodland, and savanna habitats and not comply with federal laws governing management of public lands. Additionally, implementation of the No Action Alternative would not provide for public education and recreation opportunities beyond what is currently available on a limited basis.

**PC #: 23****Public Concern: The Midewin National Tallgrass Prairie should not select Alternative 2.**

“Although implementation of Alternative 2 may produce the largest grassland bird populations, this option does not appear to provide the best opportunity to develop sufficient native prairie habitat to provide a viable ecosystem and does not provide sufficient recreational opportunities.” (Preservation/Conservation Organization, Lake Forest, IL -#62)

**Agency Response:**

Although Alternative 2 is a feasible approach for meeting the goals and accomplishing the purpose and need of the Midewin Prairie Plan, after a detailed evaluation of all the Final EIS alternatives, the Forest Service has identified Alternative 4 as the agency's preferred alternative. The Forest Service believes Alternative 4, as modified in the Final Prairie Plan and Final EIS, would provide the best approach to enhancing and restoring prairie habitat and grassland for sensitive bird species, as well as making resources available to the public and providing sufficient recreational opportunities.



**PC #: 24****Public Concern: The Midewin National Tallgrass Prairie should select Alternative 3.**

“We believe that alternative number 3 in the Draft EIS provides greater overall recreational opportunities and connection opportunities with surrounding communities. We are confident that such an alternative could be implemented to be compatible with primary ecosystem goals.” (Village of Elwood, Elwood, IL - #52)

“Of the six proposed options for review and comment in the DEIS, we would consider option number 3 as being the most favorable for equestrian participation, and the one which would be the best basis for sharing the prairie with other trail users. Option 3 should be acceptable to all conservation minded citizens. Obviously, no one group will ever be able to get exactly everything they want. Nevertheless, each constituency, whether or not they will use the area, represents tax paying citizens who are sincerely interested in the use to which the Midewin National Tallgrass Prairie will be put.” (Recreation Organization-Non-Motorized, Naperville, IL - #56)

**Agency Response:**

Alternative 3 is a feasible approach for meeting the goals and accomplishing the purpose and need of the Midewin Land and Resource Management Plan. After a detailed evaluation of all the Final EIS alternatives, the Forest Service has identified Alternative 4 as the agency's preferred alternative. The Forest Service believes Alternative 4, as modified in the Final Prairie Plan and FEIS, would provide the best approach to enhancing and restoring prairie habitat and grassland for sensitive bird species, as well as making resources available to the public and providing adequate connections to surrounding communities.

**PC #: 25****Public Concern: The Midewin National Tallgrass Prairie should not select Alternative 3.**

“Although Alternate 3 provides a better balance between grassland bird habitat and prairie, the recreational development is extensive and the heavy human use would likely interfere with the need to protect sensitive plant and wildlife species.” (Preservation/Conservation Organization, Lake Forest, IL - #62)

**Agency Response:**

The Forest Service has evaluated and analyzed Alternative 3 along with the other four action alternatives and the No Action Alternative in both the Draft and Final Environmental Impact Statements. As a result of this evaluation and analysis, the Forest Service has identified Alternative 4 as the Preferred Alternative that would best achieve the four legislated purposes of Midewin: to conserve and enhance the native populations and habitat of fish, wildlife and plants; to provide opportunities for scientific, environmental, and land use education and research; to allow continuation of agricultural land uses; and to provide a variety of compatible recreation opportunities.

**PC #: 26****Public Concern: The Midewin National Tallgrass Prairie should select Alternative 4.**

“The District appreciates and supports MNTP's use of logical planning methods and best management practices to ensure the long-term sustainability of functional natural communities as well as rare and threatened species within the site. The District supports the preferred Alternative 4. This alternative provides for the widest diversity of restoration, recreation, and visitor services at an intensity level that

seems appropriate for the scale of the site while still protecting sensitive environmental features.” (Forest Preservation District of Will County, Joliet, IL - #18)

“We commend the United States Forest Service and MNTP staff for compiling a detailed and extremely comprehensive plan for the site. We strongly support Alternative 4 (the preferred Alternative) as described in The Plan and DEIS. It is obvious to me that this alternative has been carefully crafted to meet the goals set forth by the legislation, which enabled MNTP, and also appears to be the plan, which most closely satisfies benchmarks specified by the Analysis of the Management Situation (AMS) developed in 1999. We provide several suggestions that are related to topics addressed [in] Alternative 4. However, we also acknowledge that these comments are probably just more specific than would be reasonable to expect in either of those documents, so it is our hope that MNTP staff would consider additional points in adopting specific policies after a final plan is approved for the site.” (Individual, Carol Stream, IL - #55)

### **Agency Response:**

The Forest Service has evaluated and analyzed Alternative 4 along with the other four action alternatives and the No Action Alternative in both the Draft and Final Environmental Impact Statements. As a result of this evaluation and analysis, the Forest Service has identified Alternative 4 as the Preferred Alternative that would best achieve the four legislated purposes of Midewin: to conserve and enhance the native populations and habitat of fish, wildlife and plants; to provide opportunities for scientific, environmental, and land use education and research; to allow continuation of agricultural land uses; and to provide a variety of compatible recreation opportunities.

The Forest Service implements the Prairie Plan by approving (with or without modification) or disapproving particular “site-specific” projects. Each project proposal is subject to further public involvement and review under the National Environmental Policy Act (NEPA) and the proposed projects must be consistent with the Prairie Plan. Interested groups and individuals are encouraged to stay involved with planning at the site-specific level as projects are developed and public input is solicited for individual projects.

### **PC #: 27**

#### **Public Concern: The Midewin National Tallgrass Prairie should reassess the amount of development proposed in Alternative 4.**

“Alternative 4 provides the best mix of habitats that all of the different species of birds could benefit from, but it allows for too much development.” (Individual, Urbana, IL - #53)

### **Agency Response:**

The Forest Service has evaluated and analyzed Alternative 4 along with the other four action alternatives and the No Action Alternative in both the Draft and Final Environmental Impact Statements. As a result of this evaluation and analysis, the Forest Service has identified Alternative 4 as the Preferred Alternative that would best achieve the four legislated purposes of Midewin: to conserve and enhance the native populations and habitat of fish, wildlife and plants; to provide opportunities for scientific, environmental, and land use education and research; to allow continuation of agricultural land uses; and to provide a variety of compatible recreation opportunities.

Proposed development includes a group campground, picnic area, visitor center, and several dispersed rustic campsites, along with a network of trails. Prior to building any new facilities, Midewin must be cleaned of environmental and safety hazards, such as the numerous old arsenal structures and hazardous substances. Landscape scale restoration will then begin. These

developments will occur as cleanup and restoration proceed. Future analyses will have to be completed before site-specific decisions are made for each development project.

**PC #: 28****Public Concern: The Midewin National Tallgrass Prairie should select Alternative 6.**

“Alternative 6 outlined in Chapter 2 pages 25-26 provides the largest areas of unfragmented habitat including two tracts larger than 3,000 acres as well as the fewest developed regions. Trails could be limited to the eastern edge of the site. This alternative provides more native prairie restoration and would be beneficial to the bird species that require taller grasses only.” (Individual, Urbana, IL - #53)

“MAXIMIZE THE ACREAGE RESTORED TO PRAIRIE. The Midewin National Tallgrass Prairie is an incredible and perhaps once-in-our-lifetime opportunity to restore a near-vanished native habitat to the region. I appreciate the Forest Service’s need to balance divergent - and sometimes competing - needs and interests for things such as habitat restoration, recreational use, species management and so forth. My overall concern is that the plan attempts to please too many of these competing interests, to the point where the result will be a faux panacea that fails to achieve significant results in any one area. As this is supposed to be a National Tallgrass Prairie (as opposed to a national recreation system or bird sanctuary, for example), I submit that the primary purpose should be to restore as much of the 16,000 acres to native Tallgrass prairie habitat as possible. Consequently, Alternative 6 provides the largest unfragmented acreage available to restore to native communities, including prairie habitats.” (Preservation/Conservation Organization, Saint Louis, MO - #63)

**Agency Response:**

Alternative 6 is a feasible approach for meeting the goals and accomplishing the purpose and need of the Midewin Prairie Plan. After a detailed evaluation of all the Final EIS alternatives, the Forest Service has identified Alternative 4 as the agency’s preferred alternative that would best achieve the four legislated purposes of Midewin: to conserve and enhance the native populations and habitat of fish, wildlife and plants; to provide opportunities for scientific, environmental, and land use education and research; to allow continuation of agricultural land uses; and to provide a variety of compatible recreation opportunities. The Forest Service believes Alternative 4, as modified in the Final Prairie Plan and Final EIS, would achieve a sufficient increase in unfragmented acreage, provide the best approach to enhancing, balancing, and restoring prairie habitat and grassland for sensitive bird species, and would still make Midewin’s resources available to the public.

## **4. General Environment**

**PC #: 29****Public Concern: The Midewin National Tallgrass Prairie should use all available management techniques to effectively complete the prairie restoration project.**

“IOS [Illinois Ornithological Society] believes that it is important for the Forest Service to use all available management techniques available in order to effectively complete the restoration. Among these are cutting and removing all woody vegetation, herbiciding, field tile removal, etc. Grazing should be continued to maintain shortgrass habitat for grassland birds. Forest Service staff should not be restricted in their use of these methods as long as it is consistent with the approved Prairie Plan.” (Preservation/Conservation Organization, Lake Forest, IL - #62)

**Agency Response:**

The Prairie Plan, Chapter 3 Management Area Prescriptions, describes a number of feasible and available management options including exotic species control, prescribed fire, grazing, mowing, drain tile removal, and other management activities (Prairie Plan 3-7). The Final Environmental Impact Statement also lists management activities that will be conducted at Midewin including removing drain tiles, filling ditches, reconstructing stream channels, mowing grasslands, planting and seeding, controlling noxious weeds, grazing cattle, using prescribed fire, etc. (FEIS 2-12). A wide range of management activities is prescribed to address a variety of restoration needs and habitat conditions. Project implementation depends on more detailed analyses that will be completed for the specific sites. For example, before a stream channel is reconstructed, the site will be inventoried, project objectives will be developed, issues will be scoped with public involvement, alternatives will be developed and analyzed through the interdisciplinary NEPA process, and a site-specific decision will be made.

**PC #: 30****Public Concern: The Midewin National Tallgrass Prairie should implement the proposed action to ensure positive net environmental impacts.**

“The DEIS adequately addresses environmental concerns raised by the proposed action. The Prairie Plan provides for a long-term objective and strategy to convert Midewin from a disjointed mosaic of human-dominated habitats to an inter-connected, restored natural community. The Forest Service has done a good job in defining the affected environments and describing projected environmental consequences. As would be expected from a project of this type, implementation of the proposed plan will result in net environmental benefits and will have a positive impact on the local environment through the clean-up of contaminated sites, improvements in water quality, increased biodiversity, protection of sensitive species, and increased recreational opportunities for the public. As adequately described and discussed in the DEIS, this action will have a very positive impact on the environment and should be given approval to proceed.” (Preservation/Conservation Organization, Lake Forest, IL - #62)

**Agency Response:**

The Forest Service appreciates the public interest in the future of Midewin National Tallgrass Prairie.

**PC #: 31****Public Concern: The Final EIS should include interim period standards and guidelines restricting agricultural practices that cause environmental damage.**

“The DEIS states that agricultural use of Midewin lands will be phased out as restoration activities progress. In planning for the interim period, we recommend that the USFS develop Plan Standards and Guidelines that restrict, as appropriate, farming and ranching practices that could result in the spread of noxious weeds, use of genetically modified crops that impact native species under certain conditions (e.g., Bt corn pollen impacts on Monarchs and other local lepidoptera), and use of pesticides and fertilizers that may have direct and indirect nontarget impacts on aquatic and terrestrial species.” (U.S. Environmental Protection Agency, Chicago, IL - #61)

**Agency Response:**

The Prairie Plan, Standards and Guidelines for Agriculture Use, specifies that herbicides, pesticides, or fertilizers must be approved in advance by the Prairie Supervisor, and must be applied in a safe manner that does not affect aquatic or prairie resources. (Prairie Plan 4-31) Additional guidelines call for utilizing agricultural practices that use only minimal amounts of pesticides and fertilizers authorized in advance by the Prairie Supervisor, and agricultural practices and activities will be monitored and changed as needed to minimize environmental effects (Prairie Plan 4-31).

**PC #: 32****Public Concern: The Midewin National Tallgrass Prairie should consider monitoring feasibility when describing desired conditions within the Final EIS.**

“I like the focus and description of desired conditions for the management areas. Some of the descriptions look too prescriptive, though, such as ‘no woody edge within 164 feet of the boundary’ (page 3-3) 82 feet. Whatever conditions you put in will need to be monitored; make sure that you can accomplish and monitor what you describe. The more specific you are the more difficult it will be to monitor.” (Forest Service Employee, No Address - #26)

**Agency Response:**

The management prescriptions in the Prairie Plan for different habitat types were designed to manage a variety of sensitive species. We have made the prescriptions less specific by either adding the word “approximately” to the conditions where appropriate or adding a range of conditions to be met in order to reduce the specificity of desired conditions and making it less difficult to monitor habitat conditions.

**PC #: 33****Public Concern: The Midewin National Tallgrass Prairie should monitor the effects of climate change on habitat conditions.**

“We recommend that the USFS consider climate change in the planning process by tracking the abundance and distribution of species, to the extent possible through monitoring, over the life of the management plan. Potential shifts to consider due to climate change include: habitat changes that would take place faster than fish and wildlife may be able to adapt, and variation in water temperature that could affect fish populations in critical ways (i.e., depletion or elimination of fish stocks). Climate change (mean temperature and precipitation changes over time and associated increases in atmospheric carbon dioxide) and vegetative community changes over the planning period could be significant for Midewin.” (U.S. Environmental Protection Agency, Chicago, IL - #61)

**Agency Response:**

The Forest Service's obligation to address climate change is presented in the Global Climate Change Prevention Act (GCCPA). GCCPA amended the RPA to require the Secretary of Agriculture to consider the potential effects of global climate change on the condition of the renewable resources on the forests and rangelands of the United States, and to analyze opportunities to mitigate the buildup of atmospheric carbon dioxide and reduce the risk of global climate change. The statute does not require every programmatic or site-specific decision to consider global climate change, instead it gives the Secretary the discretion to consider this issue as appropriate. The agency analyzed the global climate change issue in the 1990 RPA Program.

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However, future site-specific analyses of potential projects would address as appropriate elements such the existing condition of and effects to wildlife, vegetation, and water that may be the result of or indicative of climate changes.

As we undertake restoration on a landscape scale during the next decade and beyond, considerable changes in the abundance and distribution of plants and animals will continue to happen, with the intent to benefit conditions for sensitive species and restore tallgrass prairie habitats to the extent possible. We rely on soil patterns and existing hydrological conditions to determine the historic and potential distribution of wetlands, and we recognize that climate change could dramatically affect the water budgets for wetlands at Midewin, including the perennial streams. Better knowledge of anticipated climate changes and the effects on the ecological processes at Midewin will be useful information.

**PC #: 34****Public Concern: The Final EIS should include provisions to transfer management of Will County landfill property to the Midewin National Tallgrass Prairie.**

“The landfill will be completed some day. It should be designed to finally become a part of MNTP [the Midewin National Tallgrass Prairie]. It can have recreational value and/or used as habitat for flora and fauna.” (Individual, Gurnee, IL - #29)

**Agency Response:**

The Will County landfill authorized under the Illinois Land Conservation Act is designated to become part of the Forest Preserve District of Will County once the site is filled. The landfill is expected to be active for 20 years once it becomes operational. The Forest Service has no jurisdiction on county lands. The Midewin Prairie Plan outlines the basic direction for lands now administered by the USDA Forest Service, Midewin National Tallgrass Prairie for the next 10 to 15 years.

**PC #: 35****Public Concern: The Midewin National Tallgrass Prairie should reexamine information regarding scenic integrity of the proposed Will County landfill.**

“Chapter 3 of the Draft Environmental Impact Statement, entitled, ‘Affected Environment and Environmental consequences, ‘Scenery,’ page 232 contains an inaccurate and misleading commentary on the County Landfill. This passage states, ‘A proposal for the landfill includes a mounded system that may reach 150 feet above adjacent lands. It is expected that the upper portion of the site, as the mound develops, will always be unvegetated and heavy equipment (scrapers, end loaders, etc.) will be visible during working hours. The landfill will be visible from many parts of the prairie.’ The proposed County landfill was designed not as a ‘mound’ but as a landform with undulating topography to blend with surrounding prairie. The landfill will be vegetated, with native grasses and forbs chosen in conjunction with the Midewin National Tallgrass Prairie staff. In contrast to the widely publicized idea that the landfill is to be located adjacent to the Abraham Lincoln National Cemetery, the landfill is actually over 2 miles from the cemetery and may not be significantly visible from all portions of Midewin. The height of the landfill is approximately even with that of the water tower located nearest South Arsenal Road. This water tower is not visible from all locations within Midewin. While heavy equipment will be utilized at the landfill, the landfill is a temporary operation which will have an end-use designed to complement the recreational/aesthetic values of the Prairie. Such end-use will rely heavily on the input of the Will County Forest Preserve District and Midewin staff. In contrast, the industrial park on the west side of Route 53 will be a more permanent visage on the Prairie. Such permanent industrial presence, which may not be as

lightly-industrial as assumed in this section, should be more thoroughly investigated in terms of scenery conflict, noise, and odor.” (Will County Land Use Department, Joliet, IL – #46)

**Agency Response:**

The Draft and Final Environmental Impact Statements were prepared with the best available information. Recent meetings with Will County Land Use Department indicate that when completely full, the landfill will rise approximately 145 feet above the existing topography. Using digital elevation modeling the landfill will be visible from much of Midewin once completely developed. Trees and other building structures, however, may obstruct views of the landfill. We understand that plans for the landfill also include a buffer area with proposed berms and screening vegetation. The Forest Service will continue to cooperate with the Will County Land Use Department, the Forest Preserve District of Will County (future land managers of the landfill), and other developers adjacent to Midewin in order to mitigate environmental impacts as these sites are developed.

**PC #: 36****Public Concern: The Midewin National Tallgrass Prairie should consult with the Will County landfill developers and operators prior to completion of the Final EIS.**

“We are concerned about some of the statements made in the Draft EIS regarding the Will County landfill, in particular the language contained on page 3-232 of Chapter 3, Affected Environment and Environmental Consequences, which is as follows: ‘A proposal for the landfill includes a mounded system that may reach 150 feet above adjacent lands. It is expected that the upper portion of the site, as the mound develops, will always be un-vegetated and heavy equipment (scrapers, end loaders, etc.) will be visible during working hours. The landfill will be visible from many parts of the prairie . . . .’ We believe this is an inaccurate generalization of the landfill. Given the controversy surrounding the landfill being adjacent to the prairie, we are disappointed that no one from the Midewin staff or any of the EIS preparers made any attempt to contact us or the landfill owner, Will County, during the preparation of the Draft EIS regarding the specifics of the landfill design or its operation. Waste Management operates over 300 landfills in the United States and many of these facilities are located in close proximity to natural and/or recreational areas and are able to coexist successfully with these land uses. Prior to the completion of the Final EIS, we would be happy to meet with Midewin staff and/or the EIS preparers so that they can fully understand how a landfill is built and operated. At the same time, we would also be happy to provide a tour of some of our facilities in the Chicago area that demonstrate how landfills can be compatible with natural and recreational land uses.” (Business, Grayslake, IL - #45)

**Agency Response:**

Members of the Midewin Planning team met with Will County planners early in the Prairie Plan planning process and have kept abreast of developments for the landfill. As the landfill timeline for development is now on a faster track, the Forest Service is coordinating more closely with Will County in an effort to determine the impact that legislated cleanup at Midewin will have on the future landfill and to minimize effects of the landfill on resources and activities at Midewin.

**PC #: 37****Public Concern: The Midewin National Tallgrass Prairie should recommend limits on the extent, height, and duration of the proposed Will County landfill.**

“In a part of the country so lacking as ours in scenic beauty and wilderness, the transformation of the old Joliet Arsenal into a national park is a priceless gift to the whole region. It distresses me to learn that the

Will County Board is even considering renegeing on its promise to limit the extent, height, and duration of operation of a proposed landfill. Although landfill sites might be the only land use actually scarcer than quality natural areas, the scope of the original landfill - limited to refuse generated within Will County over a twenty-year period - would be violated by accepting trash from elsewhere. This would end up contradicting the very reason this site is being reserved as a public asset: to enhance the recreational options for residents of northeastern Illinois. The veteran's cemetery, the two proposed industrial parks, and the landfill are all valuable, but secondary, benefits to this transformation. As Will County continues to transition from rural to suburban, I hope the Board will acknowledge the importance of scenic open space to residents and tourists alike. Please exercise your best judgment to avoid corrupting this asset.” (Individual, Oak Park, IL - #33)

**Agency Response:**

The Forest Service at Midewin is coordinating closely with Will County in an effort to determine the impact that legislated cleanup of Midewin will have on the future landfill and determine methods to minimize effects of the landfill on resources and activities at Midewin. The Forest Service has no jurisdiction on county lands.

**PC #: 38****Public Concern: The Midewin National Tallgrass Prairie should remove all arsenal buildings.**

“Remove all of the old arsenal buildings.” (Individual, No Address - #12)

**Agency Response:**

An objective of the Prairie Plan is to enhance public health and safety by reducing the number of excess facilities, structures, and related infrastructure remaining on the site from the former Joliet Arsenal, and reduce adverse effects on habitat and other resources (Prairie Plan 2-12). Clean up, demolition, and restoration are priority work for Midewin as displayed in the Proposed and Probable Management Practices for Fiscal Years 2002-2006. Backlog maintenance is the highest cost item in the projected budget (Prairie Plan, Appendix F).

**PC #: 39****Public Concern: The Midewin National Tallgrass Prairie should remove all arsenal roads.**

“Remove the arsenal roads.” (Individual, No Address - #12)

**Agency Response:**

An objective of the Prairie Plan is to decommission or remove roads not needed for administrative access or land management activities within the next decade and to return such land to the desired resource management (Prairie Plan 2-12). This does not mean that all roads built for the Joliet Arsenal will be removed. Some roads will be left for administrative access or for use as portions of routes for new trails or the proposed shuttle.



**PC #: 40****Public Concern: The Midewin National Tallgrass Prairie should retain some of the arsenal bunkers for historic value.**

“During my tour of Midewin we were offered a tour of one of the many bunkers where munitions were stored. Saving some of these would be of great interest and I believe they have historical value.”  
(Individual, New Lenox, IL - #34)

**Agency Response:**

Prior to the land transfer to the Forest Service, structures and facilities proposed for demolition were historically documented and photographed for a report completed in 1995 by the Army in preparation for eventual disposal activities. A Programmatic Agreement between the Army, Advisory Council on Historic Preservation, and the Illinois State Historic Preservation Officer determined acceptable preservation actions. The Prairie Plan states in the Desired Condition for Facilities and Transportation that former Army facilities and related infrastructure not needed for long-term objectives should be demolished, removed, and the sites re-vegetated (Prairie Plan 2-11). Due to the high cost of removal it is unlikely that all will be removed in the foreseeable future. Some bunkers may be removed as restoration proceeds and funds become available. However, we are aware that there is an opportunity to utilize some of the existing bunkers for interpretation and that many visitors will be interested in visiting a bunker at Midewin.

**PC #: 41****Public Concern: The Midewin National Tallgrass Prairie should prohibit all public access in areas suspected to contain unexploded ordinance.**

“Public access to areas known or suspected to contain unexploded ordinance (UXO) should be strictly prohibited now and in the future until such time that the Army successfully removes the UXO or otherwise eliminates the risk of UXO to humans. An example of this is on Figure 6 of the Plan where a Multi-use Trail crosses the L3 Demolition Area. L3 is known to contain UXO.” (Illinois Environmental Protection Agency, Springfield, IL - #30)

**Agency Response:**

The former Joliet Arsenal areas that contain unexploded ordinance (UXO) are still owned by the Department of Defense and have been fenced and posted with “Dangerous—Keep Out” signs. The Forest Service will continue restricting public access to these areas and will educate visitors on the safety hazards as public access increases. The Forest Service will not install a trail on Army land during Army tenure, and the Army will not be able to transfer land that has not achieved UXO clearance. In addition, the public will have limited access to Midewin for the duration of Army cleanup activities.

**PC #: 42****Public Concern: The Midewin National Tallgrass Prairie should both conduct a soil containment analysis to identify areas that can be released from the groundbreaking moratorium and refine remediation techniques for the remaining segments.**

“The Forest Service continues to be under a moratorium for ground breaking at Midewin, pending the resolution of environmental contaminant issues. We recommend that the Forest Service use the recommended preliminary remediation goals presented in the report completed by the ecological work group as screening numbers. Any area that meets these numbers should be released from the moratorium

because the likelihood that contamination would harm wildlife is slim. We understand that the Forest Service has taken samples of sediments and soils from its property, and that this comparison could be performed. Even though much of the land could be released from the groundbreaking moratorium, we recommend some continued caution with respect to the contaminant issue at Midewin. Existing streams and wetlands should be evaluated for pollutants from historic Joliet Army Ammunition Plant activities. Soils of railroad grades should be sampled prior to re-grading to determine whether hazardous levels of creosote and/or pesticides are present. The Forest Service should undertake efforts to prevent landfill and industrial area runoff from adversely affecting restored areas at Midewin.” (U.S. Department of the Interior, Philadelphia, PA - #50)

**Agency Response:**

The Forest Service continues to evaluate ground disturbance activities at Midewin on a case-by-case basis including testing of soil, streams, and railroad fill material prior to project implementation as necessary. This is the most effective way to address this issue since the need to engage in ground disturbance is not widespread and happens on a non-routine basis. The Department of Defense will prepare a new Record of Decision (ROD) on the decommissioning of the Joliet Army Ammunition Plant within the next year or two and we expect that remedial goals in this ROD for sediment and soil contaminants will become the new standard. This standard will be used to evaluate the balance of the lands already transferred and any new land transferred from the Department of Defense.

Stormwater runoff controls for Deer Run Industrial Park currently are subject to an approved stormwater plan. Construction for the future Island City Industrial Park and the Will County landfill has not begun. Midewin National Tallgrass Prairie is actively cooperating with the developers and other coordinating agencies to minimize the impacts from these developments.

**PC #: 161****Public Concern: The Midewin National Tallgrass Prairie should coordinate contaminant cleanup efforts with state and federal agencies.**

“Many studies have been done concerning contaminant issues at Midewin. Contaminated sites and potential environmental and human health risks have been identified. The Forest Service needs to continue to work with other federal and state agencies to insure the timely cleanup of sites that could interfere with the restoration of the Midewin Tallgrass Prairie.” (Illinois Natural History Survey, Champaign, IL – #67)

**Agency Response:**

The Prairie Plan tiers to the 1997 Interim Record of Decision prepared by the Department of Defense for the Joliet Army Ammunition Plant, and future Army decisions that will revise and update standards for cleanup of contaminated soils (Prairie Plan 1-3). The Forest Service has been and will continue to work cooperatively with other federal and state agencies involved with resolving these contaminant issues.

**PC #: 43****Public Concern: The Midewin National Tallgrass Prairie should prioritize prairie ecosystem protection over recreation access.**

“The Forest Service has an unprecedented opportunity to restore the last vestige of our imperiled native prairie ecosystem at Midewin National Tallgrass Prairie. As the largest owner of protected open space in northeastern Illinois, the Forest Service should not forsake the overall health and viability of the prairie ecosystem to accommodate the special interests of recreational enthusiasts. Moreover, the prairie restoration should be done in a manner that maximizes the area restored to prairie habitat, using native warm-season grasses and native forbs. This, combined with proper management methods and timing, will

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ensure that Midewin National Tallgrass Prairie achieves its full restoration potential and that the Forest Service achieves the highest and best use of the site and best serves the public interest.” (Preservation/Conservation Organization, Saint Louis, MO - #63)

**Agency Response:**

Midewin National Tallgrass Prairie was established with four main purposes, with the first being to restore the prairie ecosystem and the fourth to provide opportunities for outdoor recreation. Therefore we are challenged to restore the Prairie on a massive scale that will take many years, while at the same time directed to begin providing recreation opportunities to meet a growing public demand. Our highest priorities are maintaining and enhancing habitat for sensitive species while making the prairie a safe and interesting place for people to experience.

**PC #: 44****Public Concern: The Midewin National Tallgrass Prairie should predicate recreation access on adequate environmental cleanup.**

“I think it needs to be stressed more that recreation opportunities cannot be too developed until environmental clean up is sufficient. The issue about limiting recreation opportunity does not have to be a battle with restoration, but should be a result of clean up efforts. After all, the public’s health is the issue, and where do you expect the casual public member to participate most here - via recreation. This includes not only trails but dispersed camping.” (Individual, Evergreen Park, IL - #41)

**Agency Response:**

Human health and safety is a priority at Midewin National Tallgrass Prairie. Presently the general public has limited access to areas for hunting and two short hiking trails for outdoor recreation users. Environmental cleanup is not a concern in these areas. Escorted tours or activities for volunteers and school groups are also available. The Prairie Plan Goals and Objectives for Facilities and Transportation emphasize the need to provide safe facilities and provide for public safety. Prairie Plan Standards and Guidelines also emphasize safety in relation to cleanup and restoration activities (Prairie Plan 4-9). Areas for dispersed camping will not be opened until security and safety issues have been resolved.

**PC #: 45****Public Concern: The Midewin National Tallgrass Prairie should assess the potential impact of motorized vehicle routes on the prairie environment.**

“It is difficult to understand how equestrian use could impact the prairie more than autos and shuttles. The potential for animals to be killed, the exhaust fumes and noise, are not an issue with horses. The paved roads may also intimidate many animals from crossing, thereby limiting their natural habitat. We feel an analysis should be done to assess the impact of auto and shuttle routes to the prairie environment. Lack of this analysis creates a large deficiency in the ‘Draft Environmental Impact Statement.’” (Individual, Zion, IL - #23)

“I also believe that imbalance exists in the respective analyzes of trail use and vehicular use. If fragmentation is a concern, certainly the large shuttle loop west of Rt. 53, contained in alternative 4 would have a much greater impact on the environment than a trail. Clearly it would cause other impacts that trail use does not. These impacts include the view of shuttles traveling across the prairie (inconsistent with the Eliza Steele vision), air quality concerns, noise concerns, and a greater threat to animals crossing the road as opposed to crossing a trail. If alternative 3 is chosen, the large shuttle loop would be replaced with a trail that would have a far lesser impact on the prairie. Further, I found no environmental analysis of the effect of vehicular use at MNTP. It seems without such analysis, the DEIS is incomplete.” (Individual, Channahon, IL - #60)

**Agency Response:**

The Final EIS analyzed the effects of prescribed fire, and operation of vehicles and agricultural machinery would have on air quality (FEIS 3-41.) Trails and roads were analyzed for their effects on general wildlife habitats (FEIS 3-209, 3-211). All six alternatives were compared and analyzed for long-term outcomes for viable populations of sensitive species.

Habitat fragmentation, or connectivity was one of many factors considered in this analysis (FEIS 3-110). For each threatened, endangered, and sensitive species the direct, indirect and cumulative effects of roads and trails were analyzed and are documented in Chapter 3 of the FEIS. Alternative 4 contains approximately 10,263 acres of unfragmented habitat, and only Alternative 6 contains more unfragmented habitat at 11,685 acres. Although other alternatives call for more unfragmented tracts (up to seven in Alternative 2), Alternative 4 is the only alternative that includes more than one large tract of 3,000 acres.

When the shuttle route and trail developments are proposed as part of the Prairie Plan implementation, further inventory and analysis will be conducted at that time, including impacts to scenic quality, visitor experiences, air quality, noise, and wildlife.

**PC #: 46****Public Concern: The Midewin National Tallgrass Prairie should allow natural regeneration of roads to save restoration costs.**

“Would it be possible to leave them and let vegetation over grow the roads as has been done at Bong S.R.A. (Wisconsin DNR)? You would save removal costs if the desired ultimate habitat would not be negatively impacted.” (Individual, Riverdale, IL #16)

**Agency Response:**

Road decommissioning and obliteration will come at a cost. The Final EIS, Appendix E estimates \$30,000 per mile for 100 miles of former Arsenal roads no longer needed. That totals approximately \$3 million dollars for road removal over time. The next step is to complete an Integrated Roads Analysis to identify specific roads, prioritize their removal based on criteria consistent with the Prairie Plan, and recommend steps to decommission and obliterate them. This may mean simply closing a road or completely removing a road, re-grading the route to its original elevation, and re-establishing prairie vegetation. Leaving the roads to deteriorate slowly over time will not achieve our objective of prairie restoration. Portions of existing roads may be used as interim or permanent trails where feasible, while other roads may be used for administrative access.

**PC #: 47****Public Concern: The Midewin National Tallgrass Prairie should minimize the potential for off-trail habitat damage by establishing trail signs accompanied by strict enforcement.**

“Horses, bikes and in most cases, hikers, should be required to stay on the trails through strong signage and enforcement. The Sierra Club is concerned about horse, bike and cross-country skiing damage to off-trail habitat, as well as the increased possibility of introducing invasive non-native plant, animal and insect species.” (Preservation/Conservation Organization, Chicago, IL - #49)

**Agency Response:**

Standards and Guidelines for Recreation in the Prairie Plan include restricting equestrian and bicycle use to trails designated for those uses. Recreational activities may be restricted, prohibited, or relocated based on monitoring results to protect human safety, natural resources, and sensitive species (Prairie Plan 4-8). As trails are developed and the public gains more access to Midewin, educational programs will focus additional efforts on appropriate visitor behavior. The Forest Service employs such programs across the country. "TREAD LIGHTLY" and "LEAVE NO TRACE" are two examples. Proper signs and visitor information will be key to minimizing damage by trail users. Additionally, the exact location and route of trails will be developed in accordance with Prairie Plan guidelines, and the trails will be designed according to the designated use and expected capacity.

**PC #: 48****Public Concern: The Midewin National Tallgrass Prairie should close trails during wet periods to prevent erosion of soils and damage to habitat.**

"The Sierra Club urges prompt closure of trails during wet periods to prevent erosion and damage, especially from trail braiding and from horses and bikes in muddy areas." (Preservation/Conservation Organization, Chicago, IL - #49)

**Agency Response:**

Recreational activities may be restricted, prohibited, or relocated based on monitoring results to protect human safety, natural resources, and sensitive species (Prairie Plan 4-8). Soil and Watershed Resource Management guidelines for trail location and design offer additional measures for protection of these resources (Prairie Plan 4-6).

**PC #: 49****Public Concern: The Midewin National Tallgrass Prairie should reassess the credibility of evidence linking horse manure to the spread of invasive species.**

"I examined the lists of invasive species set forth in Tables 2 and 3 of the DEIS. Regarding those anticipated to be present in the next 5-10 years, I seriously doubt that horses could possibly spread any of those species. Further, although the DEIS is void of any time frames, I do not expect that equestrian use would have the opportunity to spread the expected invasives since the actual development of a trail system is probably years away. I, nor any other horse owner I know, feed our equestrian stock any of those plants. Most pastures and hay consist of alfalfa and timothy or a common pasture mix. Grain consists of oats, or a blend containing cracked corn, oats, or barley. Many horse owners now feed processed feeds that have no seeds whatsoever. Referring to Table 2, the list of the existing invasive species at Midewin, it certainly cannot be claimed that horses are responsible for their presence, since horses have not been on the site for more than a half-century. It is clear from the DEIS that eradication of invasives is a high priority. Horse owners do not intentionally feed any of the plants contained in Table 2, some of which might be toxic to our horses' delicate digestive systems. If seeds are passed through the manure, the low potential of germination in the proposed packed limestone trails would be negligible. The DEIS evaluates the events that have lead to the presence of many invasive species, almost all of which were caused by poor management by humans. No mention has been made that for almost 60 years, wild animals and birds have traversed the tract unrestricted and have a much greater seed-spreading potential than horses ever had or will have." (Individual, Channahon, IL - #60)

"In connection with references to invasive plants species spread in horse manure, I read both the Janis and the Guthrie articles. Neither article is a scientific study designed to test the statement for which they are references. Rather they are survey and surmise in style and have as main points: 1) the differences between ruminants and monogastrics; and 2) the loss of early plant diversity to a 'zoned' pattern, which resulted in

loss of animal diversity. Neither mentions invasive plant species deposited in manure as a cause of the plant zoning. Rather, Guthrie gives a single mention to unchewed grass seeds sprouting in a horse manure pile. I stress his use of the word ‘seems’ when he states a possible ‘co-evolutionary’ relationship between monogastric ungulates and grass. I cannot even use the word ‘hypothesis’ because his statements are not tested. Turning to fact rather than subjective opinion or legend, one finds virtually no completed research on the question of seeds contained in and sprouting within horse manure and reaching full maturity to reproduce themselves with actual invasion of new territory, much less noxious and/or invasive species, which may be poisonous to the horse in the first place! I do not think that the DEIS has an adequate reference for its statements regarding this topic. The Statements for which the Janis and Guthrie articles are references should, therefore, be omitted from the DEIS.” (Individual, Frankfort, IL - #51)

“My complaint concerns the statement found on page 3-199 of the DEIS. It deeply troubles me that such an unfounded statement would be included and repeated in several other places. The statement to which I refer is that, ‘. . . horses can be effective dispersal agents of invasive species . . .’ The author of that statement refers to Guthrie, 1984 and Janis, 1975 for support of that assertion. . . . In one of the papers, that of Guthrie, one statement mentions that, ‘. . . horses can ingest, masticate, and digest the seeds, which are high in nutrient quality and easily assimilated. The few seeds that are uncrushed by the teeth pass through unharmed and sprout in a fertilized manure pile.’ (Guthrie, p. 185). Guthrie does not support this statement by empirical data nor does he refer to any study where this phenomenon was documented. Even if this one isolated statement is taken as true, it does not support the DEIS assertion of ‘effective’ dispersal agent of ‘invasive’ species. Due to the incorrect citation of Janis and the extremely weak link to Guthrie, the credibility of the DEIS as a whole is brought into question. Unfortunately, I do not have the time or resources to read every authority referred to in this DEIS, but I wonder how many other authors are incorrectly used to support ‘scientifically’ backed claims.” (Individual, Channahon, IL - #60)

### **Agency Response:**

The environmental consequences section of an EIS forms the scientific and analytic basis for comparison of alternatives. This includes a discussion of direct, indirect, and cumulative effects and their significance. The Forest Service collected and interpreted applicable factual data to complete the environmental analysis of the current and expected physical, biological, economic and social conditions affecting, or affected by, the proposed action and alternatives to the proposed action. The conditions affecting Noxious Weeds and Invasive Species were analyzed, and the assumptions, methods and data sources including the Guthrie and Janis citations are documented in the Final EIS Chapter 3 (pp. 181-201). This includes a list of Cause and Effect Relationships/Resource Pressures and Responses. This list focuses on man-made cause and effect relationships, but does mention that the starling is likely to be a major dispersal agent for the seeds of non-native shrubs (FEIS 3-186).

In the Environmental Consequences section for Noxious Weeds and Invasive Species, equestrian use was the 11<sup>th</sup> action listed out of 17 Relevant Actions Common to All Action Alternatives (FEIS 3-194). The effects of equestrian use are documented in The Effects Analysis-Comparison of Alternatives (FEIS 3-199). A number of other actions were also analyzed for their effects on noxious weeds and invasive species. The section does not focus strictly on equestrian use. Effects on invasive species of different types of recreation use, including equestrian use, are disclosed as factual statements. Alternative 3 was determined to have the highest potential for spread of invasive species associated with equestrian use, due to its wide distribution of trails for equestrian use (FEIS 3-199). Equestrian use is not anticipated to be a significant source of invasive plant species at Midewin, provided horses and riders remain on designated trails once they are established.

We appreciate and understand that equestrians do not purposefully spread invasive plant species. Yet some of these invasive species, such as garlic mustard, sweet-clover, and thistles can occur in pastures or other areas where horses are kept or equestrians may ride, and these opportunistic invasive species can be inadvertently spread from place to place. To minimize the

chance of spreading invasive species, we will encourage all equestrians to use weed-free hay, straw, and seed (for planting pastures), and clean their horses and trailers before coming to Midewin to prevent dispersal of exotic and invasive plant species. These actions have been recommended and implemented on other federal lands to control the spread of invasive plants (USDA-Forest Service 1998; Westbrook 1998).

The two papers cited in the FEIS (Guthrie 1984; Janis 1975) provide background information as to how horses can be potential dispersal agents for seeds of exotic plant species. Contrary to opinions expressed in the comment, there is a considerable body of information concerning the ability of horses to ingest, then pass, viable seeds, including species that are considered problems in ecosystem management (Benninger 1991; Campbell 1996; Harmon and Kiem 1934; Shelby 1991; Soehn 2002). This dispersal occurs under diverse ecological conditions in Great Smoky Mountains National Park (Soehn 2002), Rocky Mountains National Park (Benninger 1991), Costa Rica (Janzen 1981), Australia (Friends of the Aranda Bushland 2001), and southern Illinois (Campbell 1996). Establishment of new infestations, however, requires sufficient disturbance to soil, vegetation or nutrient levels (Benninger-Trauz 1992; Campbell 1996). This can only occur if equestrians do not stay on designated trails and create user-made trails, as occurs on some public lands.

Equestrians do not disperse many invasive species, but off-trail use can create habitat for species dispersed by other means. The combination of frequent visits, long-distance seed dispersal (within animals or bedding and forage in trailers), soil and vegetation disturbance, and nutrient supplementation creates a potential risk greater than that posed by deer, birds, or hikers. Although equestrian use does have the potential to lead to increased infestations of invasive species, it can be compatible with the other purposes of Midewin National Tallgrass Prairie and be in compliance with the Illinois Land Conservation Act when the standards and guidelines are followed (Prairie Plan 2-6, 4-5, 4-6, 4-8, 4-20 through 4-22, 4-25, 4-26, and 4-28). This compatibility also requires responsible behaviors from equestrians.

## 5. Air, Soil, and Water Resources

### PC #: 50

#### **Public Concern: The Final EIS should accurately identify current stream conditions as well as management goals for these resources.**

“Chapter 2, desired conditions, goals, and objectives; Section 2-5; It would be important to specify exactly what the current stream conditions are and determine the goals.” (Preservation/Conservation Organization, No Address - #35)

#### **Agency Response:**

The Analysis of the Management Situation (USFS, 1999) presented detailed information on the streams of Midewin, particularly on the aquatic communities. The information in the AMS helped to define existing conditions, needs, and opportunities for management. The FEIS generally does not reproduce information from the AMS, but presents additional information on the streams of Midewin in “Water Quality” (FEIS 3-14), “Wetlands and Aquatic Resources (FEIS 3-19), “Streamflow” (FEIS 3-24), “Floodplains” (FEIS 3-29), “Biodiversity” (FEIS 3-72), and “General Wildlife Habitat Types and Associated Species” (FEIS 3-201). Further information on streams and wetlands will be collected as work on Midewin proceeds to assess aquatic and riparian conditions.

Water quality standards, indices of biological community health, assessments of channel stability, and other measures are all pertinent to the assessment and management of Midewin streams. However, at this time, there is not enough information on the streams to justify the use of a single measure of stream health to define management goals or objectives. Additionally, the Prairie Plan adheres to the principle that watershed restoration is a necessary and effective approach to improvement of aquatic conditions, and we recognize that our ability to sustain or improve aquatic conditions depends in part on changing conditions upstream. Consequently, we are committed to maintaining and improving aquatic conditions, but our measurable actions will generally occur in the watershed on Midewin rather than in the channel or aquatic community.

The Prairie Plan goals and objectives for Ecological Sustainability (Prairie Plan 2-5 to 2-7) apply to the whole prairie ecosystem, including streams. Goal 1, Objective (a) applies to streams—“maintain or enhance biological diversity within the range of natural variability”. Goal 4 and its attached objectives include measures to improve watershed conditions on Midewin (Prairie Plan 2-5). The actions in the Prairie Plan that will result in watershed improvements include restoration of roads and rail beds, removal of drain tile systems, and wetland restoration. The FEIS provides an assessment of the effects of these actions on streamflow (FEIS 3-24) and water quality (FEIS 3-14).

**PC #: 51****Public Concern: The Prairie Plan should explicitly address the relative percentage of fish to mammalian species on the Midewin National Tallgrass Prairie.**

“It is interesting to note in the early stages of the U.S. Forest Service planning process, the plan was called the ‘Land and WATER Resource Management Plan.’ As you know, the plan is now simply referred to as the Land and Resource Management Plan. We hope this change does not suggest a lack of concern on the part of the Forest Service for Midewin’s water resources. In Midewin’s streams, there are over 53 species of fish—twice the number of mammalian species that reside at Midewin. This needs to be addressed more explicitly in the plan.” (Preservation/Conservation Organization, Chicago, IL - #57)

**Agency Response:**

The title that we have used for the document is not specific to Midewin. It was established by the National Forest Management Act, which mandates and regulates the Forest Service planning process. The Illinois Land Conservation Act also refers to the Land and Resource Management Plan. Publication of subsequent planning documents, including the Notice of Intent, June 1998 and the Analysis of the Management Situation, July 1999, all mention the Land and Resource Management Plan.

Streams, fish and other species in the streams, are integral components of the prairie ecosystem and integral to management activities at Midewin. The Plan includes substantial components of watershed and riparian management and protective measures for soil and water resources, which reflect our concern for water resources on Midewin as well as downstream. Chapter 3 of the Prairie Plan provides prescriptions for improvement of aquatic resources under item (c), subheadings “Wetlands” and “Streams” and under item (d), which concerns watershed restoration. The Standards and Guidelines in Chapter 4 that pertain to soil, water, and riparian resources have been reorganized and refined for the final Prairie Plan to make them more accessible and consistent.

Three aspects of the existing conditions and management direction at Midewin lead to a large emphasis on terrestrial habitat management: (1) The plan places a high priority on management for 26 sensitive species, only one of which is an aquatic species (the ellipse). (2) The streams and aquatic communities of Midewin are today established and stabilized to a large degree,



whereas great efforts will be required to establish other components of the tallgrass prairie ecosystem. The plan is nevertheless attentive to the tasks of the extensive restoration effort in its totality. (3) One of the most effective strategies for improving conditions in the streams and marshes of Midewin is to stabilize and restore the contributing surrounding watershed areas.

In the Prairie Plan, we have added more specific references to aquatic resources in Chapter 2 (Goals and Objectives) and Chapter 3 (Prescriptions) to better represent our intention to maintain and improve aquatic communities. The Standards and Guidelines in Chapter 4 of the Prairie Plan have been re-organized and improved to provide better coherence among those that pertain to watershed resources. We have also added additional documentation to the Final EIS regarding the existing aquatic communities and the anticipated effects of implementation of the plan.

**PC #: 52****Public Concern: The Midewin National Tallgrass Prairie should proactively engage in activities to preserve watersheds outside of the plan area.**

“In order to ‘improve and protect watershed conditions to provide the water quality . . .’ the plan should include a more proactive approach to work with communities and organizations in the watershed outside of Midewin.” (Preservation/Conservation Organization, No Address - #35)

**Agency Response:**

Our ability to sustain and improve aquatic habitat in streams and wetlands at Midewin depends in part on events in connected watershed areas, and we need to be involved in overall watershed management planning efforts in order to protect our watershed resources. However, the Prairie Plan applies only to Forest Service lands at Midewin. The Forest Service has no authority over connected lands held by other owners in the watershed, and our ability to protect our watershed interests depends in large part on other stakeholders, e.g. other landowners, local groups and related agencies. We will continue coordinating our watershed projects in partnership with local groups and agencies and remaining involved in connected watershed activities and decisions.

**PC #: 165****Public Concern: The Midewin National Tallgrass Prairie should address the potential impacts to upstream agricultural and urban landowners resulting from tile line breakage.**

“Consideration should be made for drain tiles that begin upstream, and continue through the present Midewin Tallgrass Prairie. Breaking tile lines on the Midewin may have severe drainage impacts to upstream agricultural/urban landowners. We suggest working with these neighbors and develop a plan that minimizes the impacts to agricultural drainage while meeting the desired future conditions of the Midewin. This is discussed in Chapter 2, Page 2-12, 4th paragraph.” (USDA Natural Resources Conservation Service, Champaign, IL – #65)

**Agency Response:**

We are aware that the lands upstream from Midewin may depend upon the continued operation of tile lines (or ditches) that enter Midewin to maintain effective drainage. We recognize that cropland, roads, or buildings could be affected by blockage of drainage. In the Prairie Plan a standard under Wetland Restoration refers specifically to this: “Wetland restoration on Midewin will not negatively impact the drainage of adjacent or connected properties without the consent of affected stakeholders” (Prairie Plan 4-6).

We also recognize that where tile lines or ditches enter Midewin, the landscape permits opportunities to modify the tiles or ditches so that the water flows unobstructed into wetlands downstream from the property line. We can, in these circumstances, improve watershed integrity and restore riparian areas while also accommodating artificial drainage from upstream areas. Any proposal to modify drainages that enter Midewin from upstream will be analyzed on a site-specific basis to avoid potential adverse impacts.

**PC #: 174****Public Concern: The Midewin National Tallgrass Prairie should create shortgrass habitat that does not require maintenance of existing tile lines and drainage systems.**

“Must the needs of the shortgrass birds be met in one large section of Midewin? Can shortgrass habitat be created through Midewin in natural upland areas, so that these habitat areas do not require maintenance of existing tile and drainage systems? My concern is that maintenance of these drainage systems will require resources that may not be available in the future. Any shortgrass restoration should be native grasses. My concern is that visitors should be able to experience uninterrupted prairie as it once existed on the site. Restoration of Midewin should be as close to the original, natural state as possible. Midewin should not plan to keep the drainage systems in any area; again, this reduces the need for long-term maintenance.” (Individual, Chicago, IL – #64)

**Agency Response:**

The restoration of drainage will be a necessary part of the restoration of any site to native vegetation, e.g. wetlands. However, on lands that will be maintained in cool-season grasses to provide short grass bird habitat, it is not necessary either to restore drainage patterns or to maintain the artificial drainage systems. It is convenient to leave the tile systems in place for now. The tile lines will remain serviceable during the planning period without maintenance. Long-term maintenance of the drain tile systems will be expensive, and in time, all of Midewin can be restored to native prairie, with removal of the tile lines and full restoration of watershed conditions.

Ideally native grasses and forbs should be utilized for grassland areas. However, at this time the specific knowledge to adequately manage native reconstructions for grassland wildlife such as grassland birds is not available, nor are management techniques proven. If reliable techniques can be developed to manage grasslands with native prairie grasses for those birds that prefer short and medium stature grasses, these areas will be planted in native grasses. In the interim we do not want to lose these sensitive grassland bird species. A guideline has been added to the Prairie Plan to address this concern, “Conversion of the 6,720 acres of cool season grasslands to prairie will only proceed after it has been shown that management of native grasses and forbs can provide the necessary habitat for grassland bird species” (Prairie Plan 4-2).

Some of the grassland birds requiring short and medium stature grasslands are area-sensitive and require large contiguous tracts of grassland. The Prairie Plan displays these areas around the periphery of the east side of Midewin National Tallgrass Prairie, but this configuration is flexible. It is not absolutely necessary to have all cool-season grasslands in one large tract. However, lumping habitats into large, continuous tracts allows us to achieve better connectivity in areas that are restored to native habitat, optimize the unfragmented value of the cool-season grass areas, and simplify some aspects of the management for recreational uses.

In any case, the large areas of cool-season grasses will include drainage ways where riparian communities and wetlands already exist or may be restored. As restoration proceeds, we will have many opportunities to restore and enhance riparian areas among pastures of cool-season

grasses as tile lines become dysfunctional or resources become available to restore drainage patterns. These inclusions will improve the ecological diversity and interconnections in areas that are maintained in cool-season grass and create a more varied landscape for the enjoyment of visitors.

**PC #: 53****Public Concern: The Midewin National Tallgrass Prairie should manage water resources within the plan area so as to establish a watershed reference area for the region.**

“Management of Midewin is important to the overall health of the Des Plaines watershed and the attainment of water quality standards set by the State of Illinois. In the future, especially with the completion of Army remediation in the area, the Midewin area may provide an opportunity for establishing a ‘reference’ area in the watershed against which other areas with varying degrees of disturbance can be compared. USFS lands can provide consistent, long-term protection from impairments of local waters that are dominated by residential and commercial uses, agriculture, and industrial use.” (U.S. Environmental Protection Agency, Chicago, IL - #61)

**Agency Response:**

The Forest Service at Midewin recognizes the importance of watershed reference areas and the potential regional importance of watershed research that may be performed on Midewin. The Forest Service is interested in hydrological data collection in watershed areas before, during, and after restoration to support project design and assessment. Under the conditions of a restored prairie, opportunities will exist to use Midewin as a reference area for restoration projects. Such uses would be consistent with the second mandate for Midewin in the Illinois Land Conservation Act, i.e. to provide opportunities for research. We will be working with interested agencies, partners, and universities to conduct the needed research at Midewin in the future. The Prairie Plan does not make specific land allocations or set aside parcels of land for reference watershed areas; nor does it make programmatic commitments to long-term data collection for watershed reference areas.

**PC #: 54****Public Concern: The Final EIS should address methods to protect aquatic biodiversity and stream health within a larger watershed.**

“Midewin comprises the lower third of the 40-square-mile Prairie Creek watershed. The U.S. Forest Service needs to recognize that while some habitat fragmentation can be addressed on-site, aquatic habitat and water quality are watershed-driven. One of the greatest challenges Midewin faces is the protection of its aquatic biodiversity and stream health. This challenge should be listed among the others in the ‘Summary of the Analysis of the Management Situation.’” (Preservation/Conservation Organization, Chicago, IL - #57)

**Agency Response:**

The July, 1999 Analysis of the Management Situation described the existing conditions of Prairie, Grant, Jackson, and Jordan creeks, and listed water quality as a Management Concern. We have added a statement to the Summary of the Analysis of the Management Situation section in the Final Land and Resource Management Plan that reflects the challenge of protecting aquatic biodiversity (Prairie Plan 1-9). We recognize that our ability to sustain and improve aquatic conditions in streams and wetlands depends in part on events in connected watershed areas, and we need to be involved in watershed management in order to protect our watershed resources.

**PC #: 55****Public Concern: The Prairie Plan should contain a soil and water resource management standard that requires maintenance and improvement of water resource ability to support aquatic life.**

“The Soil and Water Resource Management section (4-6) contains the following Standard: ‘Management activities will not impair the ability of streams or marshes to support desired aquatic life.’ Openlands proposes that this statement should read, Management activities will maintain or improve the ability of streams or marshes to support desired aquatic life. Furthermore, this Standard needs to be strengthened by tying ‘desired aquatic life’ to measurable indices of water quality, for example, a score of 41 or better (Class B or better) on the Index of Biotic Integrity (IBI), and a Macroinvertebrate Biotic Index (MBI) of less than 6.0.” (Preservation/Conservation Organization, Chicago, IL - #57)

**Agency Response:**

We recognize the positive, active sense of the proposed change in the wording of the goal. However, our ability to maintain or improve the ability of the streams to support desired aquatic life actually depends to a large extent on the management and conditions in upstream and downstream watershed areas, areas outside of Forest Service jurisdiction. For this reason, we state that activities at Midewin will not impair the ability to support desired aquatic life, but we cannot expect with complete certainty that conditions will remain equal or improve, due to outside influences. The Final EIS concludes that management of Midewin under the Prairie Plan will result in direct and indirect beneficial effects on streamflow (FEIS 3-24), water quality (FEIS 3-14), and the physical integrity of wetland areas, including streams (FEIS 3-19). The Final EIS also notes that the cumulative effects of restoration of Midewin may be offset by developments in connected watershed areas.

Water quality standards, indices of biological community health, evaluations of channel stability, and other measures are all pertinent to the assessment and management of Midewin streams. However, at this time, there is not enough information on the streams to justify the use of a single measure of stream health to define management goals or objectives. The Final EIS also includes Benthic Macroinvertebrates as one of our Management Indicators and lists water quality, four fish species, and two mussel species among the species or conditions of interest associated with the management indicators (FEIS, 3-167, Table 1). This is reiterated under Ecological Sustainability Goal 2, Objective (g), to monitor aquatic invertebrates and conditions in perennial streams, (Prairie Plan 2-6). The proposed monitoring methods will allow us to track conditions in the streams and detect some changes in conditions, but it may not be clear whether the changes are the result of management of Midewin or other outside factors.

**PC #: 163****Public Concern: The Midewin National Tallgrass Prairie should establish a greater diversity of wetland habitat types by constructing mechanisms to manipulate water levels.**

“Just as habitat structure is managed for wildlife, through the use of fire and or grazing, wetland vegetation also needs hands-on management. One of the most cost effective methods of management is through the use of water level manipulation. We strongly encourage that all wetlands be constructed with wetland structures that permit manipulation of water levels and be used to modify plant species diversity and habitat structure to ensure a greater diversity of wetland habitat types and structure distributed as a mosaic over the Midewin landscape.” (Individual, Dundee, IL – #66)

**Agency Response:**

We recognize that water control structures can provide many options for wetland management. However, they can also be costly to install and maintain and are prone to failure. The Prairie Plan does not exclude the use of water control structures, but provides guidelines on where they may be appropriate to keep or construct. In fact, many existing wetlands have artificial water structures, albeit as simple as drain tiles or culverts under a road or rail grade. Standards and Guidelines provide guidance on this matter to favor stable, low-maintenance wetlands that function well in the landscape (Prairie Plan 4-4 and 4-5). The Forest Service will avoid the use of artificial controls to prevent costly maintenance problems at Midewin.

**PC #: 164****Public Concern: The Midewin National Tallgrass Prairie should restore shallow wetlands to provide migratory and nesting habitat for rail populations.**

“Shallow wetland restoration is another significant opportunity for Midewin. Shallow wetlands are an increasingly rare community type and Midewin has a few on site now and these have provided habitat for the state listed king rail and yellow rail in the past. Rails as a group are another guild of birds that are facing an extraordinary habitat loss. Midewin, due to its location next to the Illinois and Kankakee rivers, is a prime location for providing both migratory and nesting habitat for these important species.” (Illinois Natural History Survey, Champaign, IL – #67)

**Agency Response:**

One of the objectives of the Land and Resource Management Plan is to provide a mosaic of natural communities, including wet prairie, sedge meadow, marsh and seep (Prairie Plan 2-5). Approximately 4,650 restored acres will probably be wet prairie and sedge meadow. These shallow wetlands would be ideal for rails. Additionally, Midewin National Tallgrass Prairie contains some marsh wetlands and more will develop as inclusions in the wet prairie/sedge meadow wetlands.

**PC #: 56****Public Concern: The Prairie Plan should include a continuous water monitoring program to detect potential contamination.**

“Have a continuous water monitoring program to assure that there is no contamination from plumes as yet to be detected.” (Individual, No Address - #12)

**Agency Response:**

We use the Remedial Investigations and Ecological Risk Assessments of the U.S. Army to provide baseline information on the types and distributions of contaminants on the former arsenal site and management needs for Midewin. The U.S. Army has monitoring and remediation programs in place for contaminated sites of the former arsenal. The Forest Service has assessed contamination in parts of Midewin, particularly wetlands and rail beds, to provide additional information on environments and contaminants of concern. We will continue to perform confirmatory, periodic, or continuous monitoring in a practical manner as needed, e.g. to determine the presence or absence of contaminants, to better describe their distributions and concentrations within an area, or to determine needs for remediation.

**PC #: 57****Public Concern: The Final EIS should require the completion of wetlands delineations prior to wetland restoration efforts.**

“Having noted that [the] DEIS is more programmatic than project specific, U.S. EPA recommends that wetland delineations be conducted prior to wetland restoration efforts, trail and road building. (U.S. Environmental Protection Agency, Chicago, IL - #61)

**Agency Response:**

The Forest Service has completed a wetland inventory across Midewin using available maps, aerial photographs, and limited field verifications. The inventory is useful for planning purposes, and field determinations will be completed for site-specific projects for wetland restoration, road or trail construction, or other ground-disturbing activities. In all cases that involve wetland restoration or impacts to wetlands, the Forest Service will apply for the appropriate permit through the Army Corps of Engineers. Field determinations were completed for each of the wetland restoration projects that Midewin has already initiated.

**PC #: 58****Public Concern: The Midewin National Tallgrass Prairie should consult the U.S. Army Corps of Engineers regarding wetland delineation and permitting requirements for restoration activities.**

“The USFS should consult with the U.S. Army Corps of Engineers regarding wetland delineations, and possible permitting needs associated with wetland restoration activities. Under CWA [Clean Water Act] Section 404(f)(1)(A), normal farming and ranching practices (e.g., plowing seeding, cultivating, minor drainage, and harvesting for food) are not prohibited or otherwise subject to regulation. Also, construction and maintenance of farm roads is exempted under CWA Section 404(f)(1)(E), but only in cases in which ‘such roads are constructed and maintained in accordance with best management practices, to assure that flow and circulation patterns and chemical and biological characteristics of navigable waters are not impaired, that the reach of navigable waters is not reduced, and that any adverse effect on the aquatic environment will be otherwise minimized.’ CWA Section 404 exemptions do not apply if the discharge contains any toxic pollutant listed under CWA Section 307.” (U.S. Environmental Protection Agency, Chicago, IL - #61)

**Agency Response:**

The Forest Service has consulted with the U.S. Army Corps of Engineers about the requirements of the Clean Water Act in the past and will continue to do so. The Forest Service adheres to the Clean Water Act, including the permitting process, as applied by the Army Corps of Engineers and will seek authorization for impacts to wetlands under the 404 permit program for a variety of future activities, principally wetland restoration. Permits will be necessary for many projects because the restoration of soils and drainage patterns will require the modification of roads, rail beds, or ditches where wetlands currently exist. Future roads and trails will avoid wetlands; if a wetland were to be impacted, Midewin would apply to the Army Corps for a 404 permit for recreational facilities. Most, (if not all), future activities for crop production and road maintenance or construction will not require a 404 permit because existing crop fields and roads are being used, and the Prairie Plan proposes their gradual reduction.

Information on the wetlands of Midewin is provided in the FEIS under “Wetlands and Aquatic Resources” (FEIS, pp. 3-19 to 3-24), and includes a description of direct and indirect effects to existing wetlands. “Potential effects on existing wetlands will be analyzed for site-specific projects and mitigated if necessary. Mitigation rules for wetlands under the Clean Water Act apply” (FEIS 3-24).

**PC #: 59****Public Concern: The Midewin National Tallgrass Prairie should categorize constructed or renovated wetland areas as “passive” wetlands.**

“Any wetland construction and renovation should become ‘passive’ wetlands. I’ve seen expensive control structures suffer from lack of physical maintenance, and routine water control often falls by the wayside.” (Individual, Gurnee, IL - #29)

**Agency Response:**

Water control structures can provide many options for wetland management. However, they can also be costly to install and maintain and are prone to failure. The Prairie Plan does not exclude the use of water control structures, but provides guidelines on where they may be appropriate to keep or construct. In fact, many existing wetlands have control structures, albeit as simple as culverts under a road or rail grade. Standards and Guidelines provide guidance on this matter to favor stable, low-maintenance wetlands that function well in the landscape (Prairie Plan 4-4 and 4-5). Midewin will generally avoid the use of control structures to avoid costly maintenance problems.

**PC #: 60****Public Concern: The Final EIS should provide additional information regarding allowable agricultural practices and existing wetland values as a means to increase public and agency awareness.**

“Having reviewed the DEIS, U.S. EPA rates the document EC-2, Environmental Concerns, Insufficient Information. An Environmental Concerns Rating indicates that our review has identified environmental impacts that should be avoided to fully protect the environment. Our concerns, which we believe are shared by the USFS, include water quality, existing wetland functions, invasive species, and non-target impacts of agricultural practices. Providing additional information on agricultural practices that would be allowed at Midewin, and on existing wetland values to Midewin’s existing species contingent would assist both the public, other agencies, and the decision maker in understanding Midewin’s present and planned future.” (U.S. Environmental Protection Agency, Chicago, IL - #61)

**Agency Response:**

The Final EIS describes the alternatives in Chapter 2. In “Elements Common to Action Alternatives 2 Through 6 under Habitat Management,” the Final EIS describes the grazing program needed to manage habitat. It also describes the legislated need to continue valid agricultural leases and those agriculture practices with the purpose of habitat restoration and management. Further, the Final EIS states that crop production will diminish over the next ten years as croplands are converted to cool season grassland habitat or native prairie vegetation (FEIS 2-13). Existing wetlands and aquatic resources are described and analyzed in the Final EIS. The environmental consequences analyze the direct, indirect, and cumulative effects of actions prescribed for each alternative. The Prairie Plan based on Alternative 4, outlines Standards and Guidelines for Soil and Water Resource Management, Wetland Restoration, and Agriculture Use.

**PC #: 61****Public Concern: The Prairie Plan should prohibit drilling of new water supply wells within Groundwater Management Zones.**

“We concur with the Illinois Environmental Protection Agency’s (IEPA) comments of August 28, 2001. The Superfund Record of Decision (ROD) for the Joliet Army Ammunition Plant, which also applies to

Midewin, requires that groundwater above the Maquoketa shale not be used for potable water supply. Any new water supply wells should not be drilled within or near Groundwater Management Zones, which are delineated in the October 1998 Superfund ROD.” (U.S. Environmental Protection Agency, Chicago, IL - #61)

**Agency Response:**

The Department of Defense, Record of Decision, published on October 1998, Section 9.2.1.1 Groundwater Management Zone (GMZ) states, “Deed restrictions, as described in Section 9.2.1.2 address limitations on actions and on the use of groundwater within the GMZs”. Part 9.2.1.2 imposes a deed restriction, which states “...groundwater above the Maquoketa Shale shall not be used for potable water supply.” The Forest Service acknowledges this restriction and notes that this restriction is severely limited in its scope, addressing GMZs only. The only land currently part of Midewin in a Groundwater Management Zone, is a small section of land south of Prairie Creek and west of Chicago Road. The Forest Service coordinates any new water supply wells, such as for livestock, with the Army and will avoid well installation in a groundwater Management Zone.

**PC #: 62**

**Public Concern: The Midewin National Tallgrass Prairie should analyze the functions of existing wetlands, as well as mitigation for wetlands loss, within all future wetland assessments.**

“Although restoration efforts are likely to show net benefits to wetland functions and values, we recommend that in future NEPA analyses the USFS discuss the lost functions from existing wetlands, whether those losses would be significant to any endemic or remnant plant or animal populations, and how mitigation or compensation for those losses will be addressed in the wetland restoration process.” (U.S. Environmental Protection Agency, Chicago, IL - #61)

**Agency Response:**

The Final EIS describes a variety of anticipated impacts to wetlands, particularly in “Wetlands and Aquatic Resources” (FEIS, 3-19 to 3-23). Wetlands that occupy ditches, roads, or rail beds are likely to be modified or replaced in order to restore the soils, hydrological patterns, and scenic integrity of the landscape. Also, wetlands that have become dominated by successional forest, shrub/scrub communities, or some herbaceous species may be modified to create more desirable vegetation and habitat, e.g. nesting habitat for the king rail. As disclosed in the Final EIS, the implementation of the plan will increase the extent and quality of wetlands.

In site-specific analyses for projects that may impact existing wetlands, the condition and value of those wetlands will be assessed, including their importance to plant and animal populations. Mitigation or compensation for losses will be addressed in the NEPA documentation for any given project as well as in the 404-permit process through the Army Corps of Engineers. The Final EIS states, “Potential effects on existing wetlands will be analyzed for site-specific projects and mitigated if necessary. Mitigation rules for wetlands under the Clean Water Act apply” (FEIS 3-24).

**PC #: 63**

**Public Concern: The Prairie Plan should include a clarified definition of the term “wetland restoration.”**

“Table 1.1, pg. 1-12, lists the minimum and maximum acres suitable for key resources. Does ‘Wetland Restoration’ include streams or just hydric soils? This needs definition. For example, instead of ‘wetlands’



use ‘streams and palustrine wetlands’ or ‘marshes, seeps, wet prairie’ to define what is meant by ‘wetlands.’” (Preservation/Conservation Organization, Chicago, IL - #57)

**Agency Response:**

The Forest Service uses a definition of “wetlands” that is taken from the federal manual from the Army Corps of Engineers. In that definition, “wetlands” includes streams. We have tried to remain consistent with that definition, so that when the term “wetland” appears, it includes streams, as well as marshes, wet meadows, etc. When only streams or only palustrine wetlands are the topic of the text, we have used those terms accordingly. In the Prairie Plan, Table 1.1, page 1-13, the term “wetland” includes streams.

**PC #: 64****Public Concern: The Midewin National Tallgrass Prairie should prohibit disturbance of streambeds by area visitors.**

“Page 4-7, (6). This should read ‘prohibit’ (not restrict) recreational wading, swimming, etc. Cumulative disturbance of streambeds must be minimized.” (Individual, Joliet, IL - #17)

**Agency Response:**

Cumulative disturbance of streambeds should be minimized. A Prairie Plan guideline under Soil and Water Resource Management allows entry into streams for educational, administrative, and research purposes only. It further restricts entry into streams for recreational purposes with exceptions by permission. We believe that these limits to human disturbance of streambeds throughout Midewin will be adequate for the foreseeable future. We have revised the guideline slightly to better reflect our intentions, so that it now reads as follows, “Restrict access to streams and marshes to minimize cumulative effects to the aquatic resources. Allow entry into streams and marshes for educational, research and administrative purposes. Prohibit recreational wading, swimming, or boating in streams or wetlands, except when authorized by a special use permit or in designated areas” (Prairie Plan 4-7).

**PC #: 65****Public Concern: The Midewin National Tallgrass Prairie should bypass the Prairie Creek dam and restore the stream to its original bed.**

“Under ‘Riparian Restoration’ item 5, page 4-5; In lieu of the dam removal on Prairie Creek, it may be wise to consider bypassing the dam and returning the stream to its original bed.” (Preservation/Conservation Organization, No Address - #35)

**Agency Response:**

The Prairie Plan does not include a site-specific decision for the future of the Kemry Lake dam along Prairie Creek. Following further investigation of conditions and options, a decision will be made on removing or retaining the dam. Implementation of Prairie Plan Wetland guidelines allows for the removal of the dam, if ecological conditions and water resource functions can be improved (Prairie Plan 4-4 and 4-5).

**PC #: 66****Public Concern: The Prairie Plan should identify management prescriptions for invasive species in near-shore areas.**

“General Questions/Comments related to Appendix A: A-22 *Maclura pomifera*, and *Lonicera* spp, introduced species, have naturalized and formed thickets in many riparian areas. Explain how these and other invasive species will be managed in near-shore areas.” (Preservation/Conservation Organization, Chicago, IL - #57)

**Agency Response:**

Appendix B of the Prairie Plan provides a list of species that are desired in riparian areas. The management prescriptions for different reaches of streams or shorelines will reflect the existing and desired future conditions for each site. Prescriptions will vary with soils, hydrological patterns, site topography, and the ecological or aesthetic functions of the site. Pertinent Prairie Plan Standards and Guidelines include the following:

4.2.1.3.3. “Restoration Procedures for Native Vegetation”, Guideline 1 - Prescribe restoration of native vegetation based on site potential, soil types, historic vegetation types and conditions, and extant remnants on similar sites (Prairie Plan 4-4).

4.2.1.4.2. “Riparian Management”, Guideline 2 - Manage riparian vegetation toward native species. Manage woody vegetation along fish-bearing streams to provide shade, cover, coarse organic matter, and large woody debris to the aquatic community. Manage woody riparian vegetation to sustain beaver activity where desirable (Prairie Plan 4-7).

Vegetation in riparian areas, including banks or shorelines, will be managed with a variety of techniques; the schedules and methods of management will vary according to site conditions. Undesirable woody species along banks and shorelines may be cut and removed by hand. Machinery may be used for the same purpose, particularly in conjunction with any stabilization or reconstruction efforts (e.g. removal of spoil banks). Riparian areas may be grazed as part of an open pasture or as a distinct riparian pasture, with timing and intensity of stocking designed to meet ecological objectives (e.g. control of common reed, *Phragmites australis* or to increase forb diversity). Spot applications of herbicide may be used (following further analyses of effects) to control woody growth (e.g. application to cut stumps of invasive tree species) or invasive herbaceous species, such as purple loosestrife. Fire will also be used to promote and maintain healthy riparian communities.

**PC #: 67****Public Concern: The Midewin National Tallgrass Prairie should ensure that prescribed burns do not contribute to ozone emissions in the Chicago areas ozone non-attainment zone.**

“Midewin lies within the ozone non-attainment zone for the Chicago area; it is important that prescribed burns are timed and implemented in a way that would not contribute to ozone emissions. We support the USFS Plan Standards and Guidelines that recommend: preparing a smoke management plan prior to prescribed burns; compliance with the Clean Air Act and other applicable federal, state, and local air quality regulations; and, preventing implementation of burns during ozone or other air quality alerts or during periods when particulate matter levels are near or above National Ambient Air Quality Standards.” (U.S. Environmental Protection Agency, Chicago, IL - #61)

**Agency Response:**

Prairie Plan Standards and Guidelines for Air Quality and Smoke Management call for compliance with applicable federal, state, and local air quality standards and regulations, including the Clean Air Act. Air Quality Standard #3 specifically states, "Do not perform prescribed burns during ozone alerts or related air quality alerts issued by Illinois EPA." Standard #4 further directs that we, "Avoid burning during periods when ozone or particulate matter levels are near or above National Ambient Air Quality Standards (i.e. when alerts may be imminent)" (Prairie Plan 4-19).

## 6. Vegetation

**PC #: 68****Public Concern: The Midewin National Tallgrass Prairie should restore a matrix of appropriate plant and animal communities within the plan area.**

"From its inception, one of the obvious and most commendable goals of MNTP has been landscape-scale, re-creation of tallgrass prairie and/or maintenance of habitat structure which encourages nesting by grassland birds. Such a large-scale restoration is ambitious, and will need first to concentrate on establishing (where appropriate) tallgrass prairie matrix. Various portions of the DEIS and The Plan address issues of how MNTP will seek to carefully re-create communities (presumably including diverse and appropriate animal assemblages) resembling those found in a mosaic native tallgrass prairie or associated communities (e.g., wetlands and woodlands). We have no doubt that MNTP staff will develop methods for re-creating absent plant communities, and restoring degraded examples of plant communities which remain on site." (Individual, Carol Stream, IL - #55)

**Agency Response:**

Alternative 4 will restore, create, and manage for a matrix of appropriate plant and animal communities of the tallgrass prairie ecosystem. Wherever possible, the distribution of the habitats within this matrix will be controlled by edaphic features, such as soils and hydrology, interacting with fire and grazing (Prairie Plan 4-4, and FEIS 3-73 to 3-101). Alternative 4 will result in a mosaic of habitats that is essential for the restoration of interactions between organisms, and provide environmental heterogeneity for certain wildlife species (e.g., upland sandpiper, Blanding's turtle). Detailed information on proposed restoration of plant communities at Midewin and the consequences of these actions can be found in the Prairie Plan (4-2 through 4-5, Appendices A and B) and FEIS (3-45 through 3-72).

**PC #: 69****Public Concern: The Prairie Plan should establish a protocol to convert cool-season, non-native grassland to native tallgrass prairie.**

"Under the proposed plan, the long-term objective is to have 6,720 acres of cool season, non-native grasslands. Such a regime would make this artificial community the dominant habitat. Even though we realize that much of this grassland will occur on what is now planted in row crops, we recommend that the long-term plan should be for native grassland to be the dominant habitat. It may be a reasonable interim objective to provide artificial habitat for grassland birds - as this group is one of the highest conservation priorities for Midewin and for the Chicago Wilderness region generally. But research should be pursued that would allow the replacing of cool-season pasture with high-quality prairie. The long-term goal should be for Midewin to be principally native tallgrass prairie and wetland habitats." (Preservation/Conservation Organization, No Address - #49)

**Agency Response:**

The dominant vegetation at Midewin National Tallgrass Prairie will be prairie (8205 acres of combined upland typic prairie, wet typic prairie, and dolomite prairie), compared to 6560 acres of agricultural grasslands (FEIS 3-60). However, we do agree that agricultural grasslands composed of non-native, cool-season grasslands will dominate large portions of Midewin. This is primarily to provide habitat for grassland birds, considered one of the highest conservation priorities in the Midwest.

At present, ecologists and land managers have yet to determine the management regimes required to accommodate these species' needs in high quality restored habitat. We anticipate that developing this management on a large scale will take time, and implementation may not be possible within the period covered by this Prairie Plan. Therefore, agricultural grasslands are necessary to prevent loss of this portion of the prairie ecosystem (grassland birds). To manage only for native tallgrass prairie and wetlands would result in the loss of these sensitive species (Prairie Plan 1-9; FEIS 3-98, 3-144 to 3-150, 2-28 to 2-31). We agree that research should be pursued that would allow the replacement of agricultural grasslands with high-quality native restored prairie as habitat for these species (Prairie Plan 1-9, Appendix A-23-24, and FEIS 3-95).

**PC #: 70****Public Concern: The Midewin National Tallgrass Prairie should provide seeds for restoration projects outside of Midewin.**

"I'd like seeds to be made available to the public for grassroots restoration projects in the inner cities." (Individual, Chicago, IL - #42)

**Agency Response:**

For the immediate future, we foresee using all the seed and plants we can produce through our seed production facilities for restoration activities at Midewin. As interpretive and environmental education programs expand at Midewin, making seeds available to the public for grassroots projects may be possible where these actions do not conflict with Forest Service direction prohibiting competition with private nurseries.

**PC #: 71****Public Concern: The Prairie Plan should allow flexible approaches to the collection and redistribution of grassland seeds.**

"When collecting seeds in the fields, it's not always necessary to collect by species or to clean the seed. I often concurrently collect several species from a habitat. These seeds are not cleaned, but mixed with a carrier and broadcast the same day into a suitable habitat. This saves labor and is a rewarding experience for volunteers." (Individual, Gurnee, IL - #29)

**Agency Response:**

Given the size and plant material requirements of Midewin (we hope to restore up to 250 acres on an annual basis), such an approach will not be practical. Annual stripping of seeds from nearby remnants would eventually have adverse effects on native plant populations in these remnants and is still likely to fall short of our needs (Prairie Plan 4-3 and 4-25, FEIS 3-45 to 3-100). Collecting and immediately re-seeding focuses on a portion of prairie vegetation, principally those species that flower in middle and late summer, and carry seed into fall. This is one factor contributing to the absence of spring-flowering prairie forbs and many native cool-season grasses in numerous prairie reconstructions, and domination by late-ripening, easy-to-collect tall grasses. Our seed production will allow Midewin staff to avoid wild seed shortages caused by insects, droughts, or management. Additionally, harvesting, cleaning, and testing seeds will allow us to

make custom mixes for specific habitats and reduce seed wasted by sowing on inappropriate sites.

**PC #: 72**

**Public Concern: The Prairie Plan should allow grazing for the management of short grass habitat.**

“For reasons provided in the DEIS and Prairie Plan, cattle grazing should be allowed as a management tool for managing habitat for species that require short grasses. It is anticipated that, at some time in the future and for the benefit of visitors, consideration will be given to allow a small herd of Bison to graze a limited area of Midewin.” (Individual, Wilmington, IL - #27)

**HABITAT FOR GRASSLAND BIRD SPECIES**

“Management for Grassland Birds Must Include Grazing. In my opinion, the continuation of grazing at Midewin is essential for maintaining viable populations of both Upland Sandpipers and Loggerhead Shrikes at this site. The literature regarding both of these species shows them to be strongly associated with grazed grasslands in the Midwestern United States. My on-going research at Midewin and elsewhere in Illinois also shows that both of these species are highly dependent on grazing. In fact, in over 2,500 point counts that me and my colleagues have conducted in Illinois grasslands between 1995-2001, we have only once ever encountered a Loggerhead Shrike in anything other than a grazed grassland. Furthermore, over 90% of our Upland Sandpiper observations have been in grazed grasslands. Our data also show that Upland sandpipers strongly avoid idle grasslands and that they are more than eight times as likely to be encountered in grazed areas as they are in other types of managed grasslands (i.e., mowed or recently burned areas) . . . The reason Midewin hosts such large populations of both of these species is its long history of providing a large, stable acreage of grazed pasturelands. Grazing also benefits other regionally declining grassland birds such as Grasshopper Sparrows, Savannah Sparrows and Eastern Meadowlarks. Even grassland birds that prefer moderate grass heights for nesting such as Bobolinks are generally more numerous in Midewin’s grazed grasslands than they are in idle grasslands elsewhere in the state. Finally, with regard to grazing Table 4-1 (page 4-21) in the Prairie Plan does not include grazing as an ‘activity’ for managing either ‘Short Stature Grassland’ or ‘Medium Stature Grassland.’ I believe this is a significant oversight for the reasons outlined in the above paragraphs. Grazing is without question the most effective and most efficient management activity for creating and maintaining the short stature grasslands required for these birds. Grazing is also an effective means of providing mid-range grasslands and should be considered as an option for the creation of medium stature grasslands at Midewin.” (Individual, Peoria, IL - #48)

**Agency Response:**

We agree that grazing is a necessary activity to manage habitat for grassland birds, especially for those requiring short-grass or medium-grass stature (Prairie Plan 1-11, 3-2, 3-3, 3-7, 4-23, 4-28, and Appendix A-23-24; FEIS. 3-96, 3-98, 3-108). Exclusion of grazing in Table 4-1 [Prairie Plan. 4-20] was an oversight and we have incorporated your suggested changes. We have also added the need for grazing in both documents (Prairie Plan. 2-4, 3-3, and Appendix A and FEIS 3-95, 3-108).

**PC #: 166**

**Public Concern: The Midewin National Tallgrass Prairie should incorporate grazing, fire, herbicides and mowing into prairie restoration protocols.**

“Grazing, fire, herbicides and mowing: It is imperative that these four land management tools be available to managers at Midewin. The Forest Service should not stand down from endorsing and allowing these practices. For example, without grazing it is clear that Midewin stands to lose some species such as the upland sandpiper and loggerhead shrike. Moreover, these management practices are vital in the control and suppression of invasive exotic species, widely used in the various phases of restoring tallgrass prairie and they are the most economical management practices for restoring ecosystem process on a landscape scale.

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However, grazing should only be used as a management tool. . . . Given Midewin's scale, conducting landscape prairie restorations will require incorporating the use of fire, grazing, mowing and herbicides to restore and maintain the structure of the prairie ecosystem and provide for continuous habitats for insects, small mammals, grassland birds, top grazers and keystone predators such as coyotes. Research should specifically be undertaken to determine how prairie restoration can be managed to promote the full range of organisms. We encourage restoration to be approached in a way that will allow researchers to determine the effectiveness of various restoration techniques." (Illinois Natural History Survey, Champaign, IL – #67)

**Agency Response:**

Grazing, prescribed burning, use of herbicides and mowing are all management activities that are allowed under the Prairie Plan. Table 3.1 indicates the prescribed activities in the management units (Prairie Plan 3-7). Under Management Area 1, grazing, prescribed burning, and mowing are allowed management activities. Weed Management is also prescribed in Management Area 1. Noxious weeds and invasive plant species would be controlled through an integrated pest management approach (Prairie Plan 2-6). Herbicides are one tool of an integrated pest management approach. Before herbicides are used at Midewin National Tallgrass Prairie, NEPA procedures will be implemented to analyze the effects of herbicide use. The prescription on noxious weeds and invasive plant species has been changed to include herbicide use (Prairie Plan 3-5).

Livestock grazing will be conducted to manage habitats to maintain specific suites of grassland birds or to achieve desired management conditions (Prairie Plan 3-4, 4-5). The grazing management prescription has been tightened to reflect the intention of using grazing for management purposes only. "Livestock will be grazed in allotted grasslands under special use or grazing permits only to maintain habitat for specific suites of grassland birds or to achieve other desired resource objectives, such as invasive species control" (Prairie Plan 3-5).

A number of research needs and opportunities have been identified (Prairie Plan Appendix E). The Forest Service will work with researchers to answer questions that will assist in the restoration work at Midewin. The restoration and management will be conducted within an adaptive management framework. We will try many different techniques and combinations of techniques. Monitoring will help determine the most successful methods under different conditions and management regimes. Research and monitoring provide the feedback mechanism for which techniques work and which do not work. We welcome input from researchers on the effectiveness of restoration techniques used at Midewin National Tallgrass Prairie.

**PC #: 167****Public Concern: The Midewin National Tallgrass Prairie should clarify the potential impacts to cattle grazing and short grass bird habitat resulting from water yield limits.**

"4-26 Livestock Grazing – Guidelines (point 4). ' . . . limiting water sources and water yields to less than 2,000 gallons per day.' What is the consumption of water per head of cattle? Will this water use cap limit the number of head of livestock that can graze on the management areas? Will this density of livestock be sufficient to maintain the grasslands in the desired conditions to meet the needs of target breeding birds?" (Illinois Natural History Survey, Champaign, IL – #66)

**Agency Response:**

We recognize the need for planning and adjustment of watering facilities to meet grazing objectives, minimize potential impacts to water resources, provide an economical and manageable system, and protect the visual integrity of the prairie. Midewin currently uses wells that were developed for livestock grazing on the former Joliet Arsenal. As implementation of the

plan proceeds, we will develop additional watering sources to meet our various needs. Not only is water a basic need for livestock, it is a tool that we can use to manage where and when grazing occurs most heavily.

The value of 2000 gallons per day represents the upper limits of production from existing livestock wells. The Final EIS discloses that withdrawals at this rate will generally have low potential for adverse effects on groundwater resources (FEIS 3-34 to 3-36), i.e. Midewin may use or develop livestock wells with these production rates without adverse impacts. However, as the grazing program and water supplies are developed over time, the Forest Service may consider and choose among various alternatives for water supply, such as higher-production wells, surface waters during high-water events, a large number of very small water sources, or delivery by trucks and tanks. The Prairie Plan Livestock Grazing guideline #4 has been edited to clarify as follows, “Analyze the potential effects on groundwater resources of any well, or multiple wells within 750 feet of each other, proposed to produce more than 2000 gallons per day. Locate and design wells to minimize potential adverse effects of withdrawals on wetlands and groundwater resources” (Prairie Plan 4-28).

**PC #: 168****Public Concern: The Final EIS should clarify management activity restrictions proposed for the period of March 15 to November 15.**

“4-21 Table 4.1 – Sensitive Species Habitat Management Activity. Under limitations for both Native Prairie Communities (Remnant and Restored Includes Dolomite Prairie, Short Stature Grassland, and all other Habitat Types), it is unclear what the meaning of the statement ‘Limit management activities March 15 to Nov. 15’ is. Does this statement mean that management activities are limited to the period of March 15 to November 15 or that — between March 15 to November 15 very little or no specified management activity will occur? We assume because the ‘Activity’ does not include grazing that it would be permitted during these time periods. We recommend that the phrases be reworked to clearly state what and when management activities will or will not be permitted.” (Individual, Dundee, IL – #66)

**Agency Response:**

Management activities would be limited during the time frame indicated. This has been reworded for better clarification, for example, “Minimize management activities between the period of March 15 to Nov 15” (Prairie Plan 4-23). Table 4.1 – Sensitive Species Habitat Management Activity (Prairie Plan 4-23) has also been modified to clarify the limitations.

## **7. Noxious Weeds and Invasive Species**

**PC #: 169****Public Concern: The Midewin National Tallgrass Prairie should expedite removal of exotic species from the project area.**

“Exotic species: I have spent the last year working on a national committee of scientists addressing issues that exotic species are imposing on our wildlands and waters. It is remarkable how quickly these invasive species can alter an ecosystem. This is a national priority management issue by allowing the use of herbicides and other means to control and contain the spread of exotic species already known from the site and new ones as they appear at Midewin. It is important to move quickly to address some of these issues, particularly the control of autumn olive, which may need both mechanical and chemical treatment. The opening up of the site to recreational activities will provide new pathways for seeds to enter (e.g. horses, hiking boots, tires and gear). We would hope that the trails open to horses is limited, and that they not be

expanded beyond those in Alternate 4. Immediate response in controlling invasive species is the best way to keep them from dominating the landscape, altering habitats and threatening listed species.” (Illinois Natural History Survey, Champaign, IL – #67)

“Invasive species are quickly becoming one of the biggest threats to our native biodiversity and I would encourage you to be diligent about the removal of invasive species and monitoring the effects of management on their abundance. Effective and environmentally friendly control methods are needed for many species. Research on this issue is an important service that Midewin could provide to the conservation community.” (Preservation/Conservation Organization, Glencoe, IL – #68)

### **Agency Response:**

We agree that invasive species, especially non-native ones, pose one of the greatest threats to the remaining natural biodiversity in the Midwest. The Prairie Plan proposes control and preventative measures to deal with invasive, non-native species and analyzes the effects of these actions (Prairie Plan 3-4, FEIS 3-193 to 3-200). Some of our preventative measures include a limited number of access points, restricting or prohibiting activities that may both introduce and create habitat for invasive plants. Our approach for dealing with existing and new infestations is modeled after Integrated Pest Management methodologies, which seek to minimize adverse impacts while providing effective control. We expect to be able to use a spectrum of tools to control invasive species, including mowing, competition, grazing, prescribed burning, and herbicides. However, we are required to analyze the effects of these tools, which will result in the development of mitigation measures to prevent adverse impacts. The effectiveness of our methods will also be monitored. Effects of mechanical and cultural control methods are analyzed in the FEIS (FEIS 3-194). Herbicides are being analyzed in a separate environmental assessment.

## **8. Threatened, Endangered, and Sensitive Species**

### **PC #: 73**

#### **Public Concern: The Midewin National Tallgrass Prairie should clear grassland fields of fragmenting features to improve habitat for bird species of special concern.**

“Fields Should Be Free of Weeded Fencerows and Other ‘Fragmenting’ Features. Some species of special concern birds at Midewin (e.g., bobolink, Henslow’s sparrow) are known to avoid locating territories and nests in the general vicinity of wooded treelines, which extend through grassland fields. Treelines are also believed to limit field use by northern harriers and short-eared owls. Fields at Midewin - especially ‘unfragmented’ fields - should be generally free of such features to the greatest extent possible. Woody vegetation needed for loggerhead shrikes can be located near the edges of grass fields as loggerhead shrikes will readily use wood vegetation at the edges of fields for nesting.” (Individual, Peoria, IL - #48)

### **Agency Response:**

Alternative 4, the Selected Alternative, provides for the restoration and maintenance of approximately 10,263 acres of unfragmented habitat. A set of five unfragmented tracts would be maintained: two tracts that are greater than 3,000 acres, two that are between 1,000 to 2,000 acres, and one that is between 500 to 1,000 acres (FEIS 2-21, Prairie Plan 3-2, 4-27).

The term “unfragmented” has been defined by the Midewin Interdisciplinary Team and includes the following:



- 1) Provide large areas of connected open grasslands at the landscape scale from 500 to 3,000 acres in size,
- 2) Open grasslands or restored prairie with less than 5% of the ground cover in woody vegetation,
- 3) No roads or multiple-use trails within the open areas, and
- 4) No savanna or woodland patches within the open grassland or prairie area (Prairie Plan 4-27).

Over fiscal years 2002-2006, the proposed and probable management practices include the conversion of approximately 250 acres per year of former cultivated land to grassland or native vegetation, and the management of up to 4,000 acres per year of grassland bird habitat (Prairie Plan F-1).

The Prairie Plan provides for habitat for edge species “in restored savannas, woodlands, forest edges, shrubby prairies and riparian habitats, and not in existing fencerows, overgrown hedgerows, shrublands and successional woodlands that are fragmenting prairie and grassland habitats” (Prairie Plan 4-30). Some woody ground cover (less than 5%) would be available for nesting by loggerhead shrikes. This woody ground cover would be scattered in small groupings around the edges of unfragmented grasslands.

Minimum unfragmented acres for each of the suites of grassland birds (short grass stature, medium grass stature and tall grass stature) have been developed to maintain viable populations of each Regional Forester Sensitive Species (Prairie Plan 3-2, 3-3 and FEIS 3-101). Bobolinks, Henslow’s sparrows, northern harriers and short-eared owls would be protected under these standards and guidelines.

#### **PC #: 74**

#### **Public Concern: The Prairie Plan should devote large, unfragmented tracts of grassland fields to sensitive grassland bird habitat.**

“Most of the Sensitive Grassland Bird Species (Henslow’s sparrow, upland sandpiper, northern harrier and bobolink) are known to be significantly more abundant in large fields. Page 2-21 (DEIS) states that one of the goals of the restoration would be to maintain six large unfragmented tracts, ranging from 500-3,000 acres in size. From a viability standpoint, the larger the fields and the more habitat that is in an unfragmented condition, the better since larger fields are much more capable of supporting larger, more persistent, and more productive populations of grassland birds than are smaller fields. I urge you to create and maintain the largest fields you can possibly create. One of the features that make Midewin so unique is the potential to create a large number of very large grassland fields. Large, unfragmented grasslands are very scarce in the Midwest (and become more scarce as time goes on) and the potential for Midewin to provide regionally significant habitat for these globally declining species is truly a ‘once-in-a-lifetime’ opportunity to significantly benefit this beleaguered group of birds.” (Individual, Peoria, IL - #48)

#### **Agency Response:**

The Draft EIS and Proposed Prairie Plan incorrectly stated the number of unfragmented tracts. The Final EIS and Prairie Plan documents have been corrected. Alternative 4 provides for five large unfragmented tracts with approximate acreage of 3400, 3200, 1700, 1100, and 800 respectively (FEIS 2-21). Although other alternatives call for more unfragmented tracts, (up to seven in Alternative 2), Alternative 4 is the only alternative that has more than one tract that is at least 3000 acres. Alternative 4 has approximately 10,263 acres of unfragmented habitat, and only Alternative 6 has more at 11,685 acres. In addition to the five unfragmented tracts there will be smaller tracts, less than 500 acres, and these will provide additional habitat for grassland birds.

**PC #: 75****Public Concern: The Midewin National Tallgrass Prairie should maintain large, unfragmented tracts of cool season grass fields while monitoring prairie restoration areas for sensitive grassland bird species viability.**

“Maintenance of Cool-season Grass Fields is Crucial for Maintenance of Grassland Bird Populations. I believe it is crucial that significant acreage (6,000+ acres) of cool season grass fields must be maintained at Midewin in order to sustain viable populations of sensitive grassland bird species. Most of these species (Short-eared owl, Upland Sandpiper, Bobolink, and Migrant Loggerhead Shrike) are rarely, if ever, encountered in native prairie restorations. While I’m hopeful the Midewin staff will eventually develop techniques to restore prairies that are attractive to these grassland birds, until it can be demonstrated that prairie restorations at Midewin do attract and support these target bird species, the maintenance of cool season grass fields appears to be the only way to maintain viable populations of these birds. Relying on prairie restorations to sustain viable populations of these species would, in my opinion, be very risky. Moreover, evaluations of whether or not prairie restorations are capable of supporting viable populations of target bird species should only be made after these restorations mature and reach a relatively stable state. Research I have conducted in prairie restorations can change rapidly as fields mature. And thus, evaluations of the suitability of these restorations to sustain viable populations of grassland birds based on data from ‘young’ restorations may be misleading.” (Individual, Peoria, IL - #48)

**Agency Response:**

Alternative 4, the Selected Alternative, provides for approximately 6,700 acres of cool season grasslands (Prairie Plan 2-3, 3-1). Biologists at Midewin National Tallgrass Prairie realize that cool season grasses presently provide the best habitat for some of the species, but anticipate that methods can be developed in the future to use native vegetation. Until a time when it can be shown that managing native grasses and forbs is successful in providing similar habitat for these grassland birds, cool season grasses will be used (Prairie Plan 4-27). Prescriptions for the grassland bird species in the Prairie Plan call for maintaining minimum populations or habitat for these grassland birds (Prairie Plan 3-2, 3-3). In order to maintain these minimum numbers, actions cannot be taken to change management practices until it is shown that the population numbers will not decrease. Therefore, conversion of cool season grasses to native grasses and forbs would only be implemented when we are confident that the conversion will be successful. Monitoring of habitat management, Regional Forester Sensitive Species populations, and Management Indicator Species will provide information on the need to maintain cool season grasslands and the degree to which native grasses and forbs are used by grassland birds such as short-eared owls, upland sandpipers, bobolinks and migrant loggerhead shrikes (Prairie Plan Chapter 6).

We realize that data based on “young” or new restorations can be misleading. Grassland bird monitoring will be an ongoing activity. Data will be available in the future on how long, if at all, these prairie reconstructions take before grassland birds can permanently utilize them. We realize the importance of monitoring grassland birds in restored areas and have added it as a research goal (Prairie Plan, Appendix E-3).

**PC #: 76****Public Concern: The Midewin National Tallgrass Prairie should ensure adequate habitat for edge species prior to connecting grasslands.**

“There are areas of the Prairie Plan in which we are specifically interested. Management of the Prairie for native species of birds is one. While supporting the creation of additional unfragmented grassland for

threatened and endangered species and sensitive bird species, we would like assurance in the plan that habitat for edge species and the loggerhead shrike are in place before removal of all fencerows, etc. (4 - 28 Plan) The *Crataegus* species (hawthorne) is listed as a native, invasive plant species with plans for control and/or removal (C - 6 DEIS) and yet it is critical shrike habitat (3-147 DEIS). All care should be taken to insure species viability in this case.” (Preservation/Conservation Organization, Joliet, IL - #47)

### **Agency Response:**

Removal of fencerows, hedgerows, and other woody vegetation will, by necessity, take place over a number of years. The migrant loggerhead shrike population and nesting locations have been monitored since 1994. The preferred nesting locations and trees are well known, and would not be removed unless there is adequate habitat elsewhere to maintain a viable population of migrant loggerhead shrikes. Management prescriptions for the migrant loggerhead shrike habitat call for maintaining a minimum amount of habitat with appropriate structure (Prairie Plan 3-3).

Hawthorns are specifically mentioned as part of the appropriate habitat (Prairie Plan 3-3). Hawthorns can be invasive and a problem if not managed properly, yet they are also necessary for many species. They would be controlled where they are a problem and encouraged where they are beneficial. Fencerows, hedgerows, and thick shrubby areas are typically of little use to loggerhead shrikes and the removal of this habitat should not impact them if nesting locations are avoided. The Prairie Plan prescriptions calls for maintaining scattered thorny trees and/or shrubs in a short grass habitat, which is the preferred migrant loggerhead shrike habitat (Prairie Plan 3-3). Monitoring of migrant loggerhead shrike populations and habitat will help the staff at Midewin National Tallgrass Prairie maintain critical habitat for this species.

Providing habitat for migrant loggerhead shrikes should also provide habitat for other edge species. Habitat for edge wildlife species would also be provided in the savanna/woodland habitat maintained and established at Midewin. Parts of the restored prairie will contain a woody or shrubby component, which will provide habitat for edge wildlife species. Although there will be a decline in common edge species as habitat is restored for sensitive grassland wildlife, there will always be habitat at Midewin for edge species.

### **PC #: 77**

#### **Public Concern: The Midewin National Tallgrass Prairie should design trails to avoid fragmenting sensitive species habitat.**

“Trail development should be well planned to direct human use away from especially sensitive areas and to avoid fragmentation of habitat. Although recognizing the desire to provide a ‘wilderness’ experience in Illinois, trails, access and amenities should be concentrated in limited areas as much as possible to afford isolation to the most important users of Midewin—the wildlife species that makes the site their home.” (Preservation/Conservation Organization, Lake Forest, IL - #62)

### **Agency Response:**

Provisions have been made in the Prairie Plan to restrict access to sensitive areas: to protect native vegetation remnants (Prairie Plan 4-25), protect nesting wetland birds (Prairie Plan 4-21), limiting management activities in sensitive species habitat (Prairie Plan 4-23), and protecting heron rookeries and raptor nests (Prairie Plan 4-30). Standards and guidelines have also been developed to protect the sensitive species within their corresponding habitats (Prairie Plan Table 4.1). Where trail location is a direct threat, provisions have been made to protect the sensitive species. For example, protection of American ginseng is provided by limiting trails and land disturbing activities, keeping such activities at least 25 yards away from these plants (Prairie Plan 4-24).

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**PC #: 78****Public Concern: The Final EIS and Prairie Plan should prioritize Threatened, Endangered, and Sensitive Species protection above development for human activities.**

“IOS [Illinois Ornithological Society] agrees with the Forest that providing habitat for and protecting threatened, endangered, and sensitive species must remain the primary objective of Midewin’s management plan. In further refinements and implementation of the Prairie Plan, the Forest Service must assure that recreational and other human activities on the site are controlled to prevent negative impacts to such species, and that their protection is the top site management priority.” (Preservation/Conservation Organization, Lake Forest, IL - #62)

**Agency Response:**

The 1995 Illinois Land Conservation Act, the enabling legislation that created Midewin National Tallgrass Prairie, lists four purposes: “1) To manage the land and water resources of Midewin in a manner that will conserve and enhance the native populations and habitats of fish, wildlife, and plants. 2) To provide opportunities for scientific, environmental, and land use education and research. 3) To allow the continuation of agricultural uses of lands within Midewin consistent with section 2916 (b), 4) To provide a variety of recreation opportunities that are not inconsistent with the preceding purposes.”

One goal of the Prairie Plan is to “Provide ecological conditions to sustain viable populations of native species . . .” (Prairie Plan 2-6). Midewin is further required by federal law to protect any federally listed plant or animal species. To these ends, recreational and other human activities must be compatible with the preservation, restoration goals set for Midewin. In compliance with the Endangered Species Act, Midewin has been in consultation with the U.S. Fish and Wildlife Service to insure that actions proposed in the Prairie Plan do not jeopardize the continued existence any endangered or threatened species.

**PLANT COMMUNITIES**

“Sensitive Species. Included in the documents should be clear statements that intact remnants of natural plant communities shall not be developed under any circumstances. Additionally, it should be stated that trails and all other development should be placed so as not to fragment or otherwise impact these communities.” (Preservation/Conservation Organization, Joliet, IL - #58)

“Implement procedures to prevent destruction of threatened and endangered flora (Morton Arboretum, Lisle, IL uses deer exclusion fencing).” (Individual, Riverdale, IL - #16)

**Agency Response:**

An objective of the Prairie Plan is to “Protect, manage, and enhance existing native vegetation remnants” (Prairie Plan 2-6). Guidelines were developed to protect areas of native vegetation including, “Native vegetation remnants present within other areas will be protected and managed to ensure long-term persistence”, “Restore all remnants to their likely original condition”, and “Locate trails or other features that may be a source of disturbance so as to avoid or minimize impacts to remnants” (Prairie Plan 4-25, 4-26).

Midewin National Tallgrass Prairie is required by the Endangered Species Act to protect federally listed species. Regional Forester Sensitive Species are those species that have been identified to be rare and at risk in a particular unit of the USDA Forest Service within the region. Frequently these include state listed species. At Midewin, most of the state listed species are on the

Regional Forester Sensitive Species list. A number of general standards and guidelines have been developed to protect these species and can be found in the Prairie Plan (Prairie Plan pp. 4-20 through 4-22). Management prescriptions specific to each habitat type for these species were also developed (Prairie Plan 3-2 and 3-3).

**PC #: 79****Public Concern: The Prairie Plan should restrict human access within sensitive habitats to benefit vulnerable species.**

“The Forest Service should limit human access to certain areas of Midewin to protect species or sensitive habitats. Since species and habitat protection should be the number one priority for the site, it may be appropriate to identify large areas of Midewin as closed to the public, even to all foot traffic, thereby providing a true sanctuary for some of the site’s wildlife. This is particularly important for some of the larger nesting birds such as Short-eared Owl and Northern Harrier that are very vulnerable to human disturbance.” (Preservation/Conservation Organization, Lake Forest, IL - #62)

“The Prairie Management Plan does not identify the exact location of trails. Are there assurances that trails will not impact areas containing endangered and sensitive species?” (Preservation/Conservation Organization, Joliet, IL - #58)

**Agency Response:**

Guidelines in the Prairie Plan contain provisions to restrict recreational activities based on monitoring results to protect natural resources or sensitive species, (Prairie Plan 4-8). Guidelines in the plan (Prairie Plan 4-20 through 4-22, 4-28) further restrict management and recreational activities to protect sensitive species, raptor nesting habitat and active heron rookeries. Activities are also restricted through standards and guidelines developed for the specific sensitive species (Prairie Plan Table 4.1). One objective of the plan is to “Protect, manage, and enhance existing native vegetation remnants” (Prairie Plan 2-6). Several guidelines were developed to protect areas of native vegetation: “Native vegetation remnants present within other areas will be protected and managed to ensure long-term persistence”, and “Locate trails or other features that may be a source of disturbance so as to avoid or minimize impacts to remnants” (Prairie Plan 4-25, 4-26).

Although the exact locations of the trails have not been identified, placement of trails will follow the standards and guidelines outlined in the Prairie Plan. Location of trails at Midewin will be determined through site-specific projects. The Forest Service’s management of Midewin National Tallgrass Prairie and other National Forests occurs at two levels. At the first level, the Forest Service develops the Prairie Plan, a broad, programmatic document that is, accompanied by an EIS with a public review process conducted in compliance with the NEPA. The Prairie Plan provides the broad framework and overall management direction. At the second level, the Forest Service implements the Prairie Plan by approving (with or without modification) or disapproving particular “site-specific” projects. Each project proposal is subject to public involvement and review under the NEPA and the proposed projects must be consistent with the Prairie Plan. We invite the public to stay involved in the management of Midewin National Tallgrass Prairie and to provide us with specific comments on trail placement when individual projects are identified.

**PC #: 80****Public Concern: The Prairie Plan should establish more frequent monitoring periods for sensitive grassland bird species populations.**

“Monitoring of Grassland Birds Should Be More Frequent than Once Every Five Years. The Prairie Plan states (page 6-11) that monitoring of Regional Forester Sensitive Species and other species of concern will be ‘conducted on rotational basis so that in any given year a subset of species is monitored, but each subset

is monitored only every five years.’ Such a program (monitoring species only once every five years) will, in my opinion, be incapable of detecting even modest changes in grassland bird species abundance. More frequent monitoring will be needed to adequately track grassland bird population trajectories at this site.” (Individual, Peoria, IL - #48)

**Agency Response:**

We agree that monitoring once every five years for some species is inadequate. The monitoring protocol was incorrect as stated in the proposed Prairie Plan. The Final Prairie Plan has been changed to: 1) “Subsets of sensitive species habitat will be monitored every year with the goal to cover all of each species’ habitat within a five year period. Specific frequencies are listed for each species or group of species” (Prairie Plan 6-11). Specific monitoring strategies have been developed for each of the sensitive species depending upon how frequent monitoring is deemed necessary. For example it has been deemed necessary to, monitor select areas of bobolink habitat on a yearly basis to determine an estimate of the overall population and success or failure of management” (EIS 3-150).

## 9. Management Indicators

**PC #: 81**

**Public Concern: The Prairie Plan should provide a list of management indicator species in a manner consistent with existing regulations, flexible to meet new regulations, and achievable within fiscal restraints.**

“Your management indicator species (3-167 in the DEIS) – shouldn’t they be part of the plan document? This is the first plan I’ve seen where they are not. You should be consistent with the ‘82 [planning] regs. Your choice of species (or not even using species) should be examined. Even though the regs ‘appear contrary to the focus of restoration and management at Midewin’ you still have to implement them. Look at what the new regs say. We may be moving to ecological indicators and not using ‘demand’ species, such as whitetail deer. What do deer indicate in the ecosystem? Every one of these indicators needs to be monitored – you may be setting yourselves up for an expensive monitoring program with the way you have chosen management indicators.” (Forest Service Employee, No Address - #26)

**Agency Response:**

Management indicators can be found in the Prairie Plan, Objectives page 2-6 and more information is in Appendix C. Management Indicators for Midewin were selected consistent with Forest Service Manual 2620.5, Washington Office amendment 2600-91-5, which states that “plant and animal species, communities, or special habitats” can be selected for planning purposes. Given the nature of the restoration effort, selection of habitats and communities is appropriate. When the new planning regulations are finalized and implemented, we will make the required adjustments and issue a plan amendment, if necessary.

Our inclusion of the white-tailed deer has been questioned because it is most commonly used as a demand species (commonly hunted, trapped, or fished) and such demand species may not be selected as management indicators under new Forest Service planning rules. However, because white-tailed deer populations may have adverse impacts on certain native plants and the restoration of Midewin as a whole, this species is viewed as an appropriate management indicator for other reasons than as a “demand species”.

We do have an ambitious monitoring plan for Management Indicators, but the monitoring is designed to be redundant, also fulfilling requirements for monitoring federally listed and sensitive species and their habitats, water quality, biodiversity, and the progress of habitat restoration and

reconstruction. This monitoring program is expected to reduce duplication in the overall monitoring effort.

## 10. Wildlife Habitat and Associated Animal Species

### PC #: 82

#### **Public Concern: The Final EIS should include wildlife management within the list of management activities.**

“Page 3-3 of the DEIS lists management activities but does not include Wildlife Management (deer hunting).” (Preservation/Conservation Organization, Joliet, IL - #58)

#### **Agency Response:**

Wildlife management was one of the management activities planned as is indicated in the draft EIS under the Wildlife section (DEIS 4-26), but was inadvertently left off the list of management activities. We have added Wildlife Management to the list of management activities in the Final EIS to correct this oversight (FEIS 3-3).

### PC #: 83

#### **Public Concern: The Prairie Plan should include a detailed “Wildlife and Population Plan.”**

“There seems to be no ‘Wildlife and Population Plan’ in detail over the 10-year LRM Plan.” (Individual, Wilmington, IL - #59)

#### **Agency Response:**

The management of wildlife habitat is an integral part of the Midewin Land and Resource Management Plan. Sections of Chapter 4 (Standards and Guidelines) in the Prairie Plan refer to wildlife management: 1) Threatened, Endangered, and Sensitive Species (Prairie Plan 4-20) and 2) Wildlife (Prairie Plan 4-29). These sections lay the foundation for the management of habitat for wildlife species at Midewin National Tallgrass Prairie. General monitoring protocol for wildlife species is given in the Monitoring Section of the Prairie Plan (Threatened, Endangered and Sensitive Species; and Wildlife). Monitoring will track population numbers of these species through direct population counts or sampling. More specific management prescriptions are specified in the Prairie Plan in Chapter 3.

### PC #: 84

#### **Public Concern: The Final EIS should address the impact of non-native fauna species on native species.**

“U.S. EPA supports the USFS policy to actively remove invasive non-native plant species that threaten native communities through manual and mechanical removal and possible use of herbicides. The USFS should also begin to focus at the appropriate level on impacts of non-native fauna (e.g., Norway rats, domestic cats) on native populations while developing future management practices at Midewin. These actions are in keeping with Executive Order 13112 on Invasive Species.” (U.S. Environmental Protection Agency, Chicago, IL - #61)

**Agency Response:**

Midewin will comply with all relevant legislation and executive orders, including Executive Order 13112 regarding invasive species. We are also concerned about possible impacts from non-native fauna. The FEIS addresses both noxious weeds and invasive species (FEIS 3-181). The term "Invasive Species" includes both flora and fauna and some non-native fauna could be defined as invasive species. As only invasive plants were defined in the glossary, the term invasive species has been added to the glossary in the Final EIS. Other non-native fauna (e.g. Norway rats, domestic cats) currently are not considered to be invasive species at Midewin. Presently, these species are not a problem, but they could threaten native species or habitats in the future. For this reason, additional guidelines have been added to the "Noxious Weeds and Invasive Species" section, and the title has been changed to reflect invasive faunal species (Prairie Plan 4-5).

**PC #: 85****Public Concern: The Midewin National Tallgrass Prairie should reexamine the presumption that equestrian use will result in adverse impacts to wildlife.**

"Has there been an analysis study done on the impact of fumes - noise from autos and shuttles? Also won't vehicles detract from the prairie landscape? Horses are natural to the area; they settled the prairie. Do you think that horses can impact the prairie more than autos & shuttles? We don't! What about birds & animals getting hit or run over by autos & shuttles? I've never harmed a bird or animal while riding my horse & mule in the 50 years I've ridden, we trailer 1,000 of miles, to trail ride, & enjoy the beauty of our great country. If an analysis wasn't done on the vehicular impacts, then the analysis isn't complete. How prejudice, doing an impact study on horses, but no motorized vehicles." (Individual, Stonefort, IL - #22)

"With respect to impacting on wild-life, someone on horseback can often approach certain animals such as deer to a degree which can never be achieved by persons on foot. Many of us have spent long periods in close-up observation of deer without in the least disturbing those herds. This is only possible as the horse is not a predator, and the horse's scent covers the human scent. As a group, and individually, we enjoy and respect nature and all of its inhabitants. Most trail riding is done in small groups of 3 to possibly 6 riders. This fact has been clearly demonstrated for many years in areas such as the DuPage Forest Preserves, the Des Plaines River Conservation District Kankakee State Park, Mathiessen State Park, Panther Creek State Park and others. It is an infrequent occasion when one of the riding clubs has a major trail ride of 25 or more people. Thus, on a day to day basis our impact is minimal." (Recreational Organization, Naperville, IL - #56)

**Agency Response:**

The impacts of motorized vehicles on air pollution and vehicle impacts to prairie fauna were analyzed (FEIS 3-225). The preferred alternative restricts motorized vehicle use to the entry roads and parking areas. This was done to avoid possible air pollution, noise pollution and vehicle impacts to animals on the roads. Alternative 4 does provide for a shuttle system or "tram". Various shuttle systems are available which are non-polluting, for example, those that are electric powered. At the speeds the shuttle would be operated, impacts to animals would be unlikely.

Equestrian use is not singled out as a direct threat to wildlife in either the Land and Resource Management Plan or Environmental Impact Statement. However the indirect threats posed by equestrian use have been analyzed, for example, potential for the spread of invasive plant species from horse manure (FEIS 3-214). Invasive plant species may alter habitats, making those habitats less favorable to some wildlife species. Other potential impacts from equestrian use

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have been minimized by restricting equestrian use to trails, retaining flexibility to close trails as needed to protect resources, and locating equestrian and multiple use trails outside of sensitive areas and at the edges of unfragmented grassland habitat (Prairie Plan 2-6, 4-8, 4-20 through 4-22, 4-25, 4-26, and 4-28).

**PC #: 86****Public Concern: The Midewin National Tallgrass Prairie should maintain hedgerows for wildlife refuge.**

“Maintain the hedgerows for wild animal refuge.” (Individual, No Address - #12)

**Agency Response:**

The FEIS analyzed impacts to edge wildlife species such as raccoon, fox squirrel, indigo bunting and American goldfinch under the section titled “Successional Non-native Vegetation Habitats” (FEIS 3-203). Hedgerows also provide barriers to grassland wildlife by fragmenting the grassland habitat. Grassland wildlife species consist of some of the most rapidly declining wildlife in North America and many grassland wildlife species are listed as Regional Forester Sensitive Species. Edge species, for the most part are considered fairly common. Goal 2 of the Prairie Plan (Prairie Plan 2-6) calls for the maintenance, enhancement and restoration of habitat for sensitive species at Midewin. To sustain habitat for sensitive grassland species, Alternative 4 provides for approximately 10,260 acres of unfragmented habitat (Prairie Plan 2-5). This will require the removal of hedgerows and other features that fragment the landscape in these areas. Although old fence lines, hedgerows, and some groupings of young secondary growth trees will be removed from these areas, scattered or small groupings of woody vegetation will remain to provide habitat for those sensitive species that require some woody vegetation and edge habitat.

Habitat for edge wildlife species will also be provided in the savanna/woodland habitat maintained at Midewin, and parts of the restored prairie will have a woody or shrubby component that will provide habitat for edge species. Although there will be a decline in some common edge species as habitat is restored for sensitive grassland wildlife, habitat at Midewin will remain for edge species (Prairie Plan 4-30).

**PC #: 172****Public Concern: The Final EIS should include a definition for the term “edge species” in the Prairie Plan.**

“We agree with the need to provide habitat for edge (early successional and shrub) nesting bird species but this is the first time we found where edge species are mentioned and this term is not defined. It would be helpful to define the term and list several representative species. In addition, it will be important to list the acreage of habitat (edge and scrublands) available for these species.” (Individual, Wilmington, IL – #66)

**Agency Response:**

The term “edge species” has been defined in the Final EIS glossary as organisms that are adapted to take advantage of the boundaries between two habitat types (such as forest and field) or fragmenting features in large blocks of habitat (e.g., openings in forests, hedgerows in grasslands).

**PC #: 87****Public Concern: The Midewin National Tallgrass Prairie should develop restoration techniques to retain prime grassland bird habitat.**

“Because the impact of tallgrass prairie restoration on bird populations is at best uncertain, existing grassland sites that support high populations of grassland birds should not initially be targeted for restoration to native prairie. Native prairie restoration should first be completed on row-crop fields where the impact to existing grassland bird populations will be minimal. Native plant species restoration in areas supporting existing grassland bird habitat should not proceed until restoration techniques are developed that will not reduce or eliminate prime grassland bird habitat.” (Preservation/Conservation Organization, Lake Forest, IL - #62)

**Agency Response:**

We share your concern that current prairie restoration techniques have not been shown to provide adequate habitat for grassland birds. This concern is addressed in the Prairie Plan and FEIS under sections on Regional Forester Sensitive Species (Prairie Plan pp. 4-20 & 4-21, EIS pp 3-101 thru 3-163). Conversion of cool season grasses to native grasses and forbs will only be implemented when we are confident that the conversion will be successful and that population numbers will not decrease.

The maintenance of approximately 6,700 acres of cool season grasslands is an objective in the Prairie Plan page 2-5). To more directly address the concern for maintaining grassland bird habitat, we have added a guideline to the Ecosystem Restoration Priorities (Prairie Plan pp 4-2): “Conversion of the 6,720 acres of cool season grasslands to restored native prairie will only proceed after it has been shown that management of native grasses and forbs can provide the necessary habitat for grassland bird species.”

**PC #: 162****Public Concern: The Midewin National Tallgrass Prairie should restore wetland areas larger than five acres to support a greater diversity of nesting bird species.**

“Managed for a distribution of small varied marshes, generally less than five acres in size. . . .’ We recognize that many of the wetlands of the area may have been small. There is a need to restore larger wetlands in order to meet the needs of many wetland nesting birds species. Research has shown that larger wetlands generally have a greater diversity of birds than smaller isolated wetlands and that complexes of smaller wetlands may function as a larger wetland and have similar species diversity, we would encourage that where practical and feasible the opportunity to restore larger wetlands be exploited. Thus we suggest wording that permits creation of larger wetlands.” (Individual, Dundee, IL – #66)

**Agency Response:**

Because of the topography of Midewin National Tallgrass Prairie, it is unlikely that many large wetlands will develop as the result of hydrologic restoration. The landscape at Midewin consists primarily of a level outwash plain and rolling ground moraine, neither of which is conducive to the creation of expansive wetlands. The only way to achieve larger wetlands would be to do complete excavation or damming of the streams. These activities are not consistent with the goal of restoring the prairie ecosystem. The Prairie Plan provides for approximately 3,600 acres of wet prairie/sedge meadow with inclusions of marsh. Although Midewin may not be able to provide habitat for wetland birds requiring extremely large wetlands, it will contribute substantially to those species requiring a mixed mosaic of grasslands and shallow wetlands. For example, rails should find the habitat restored at Midewin adequate for their specific needs.

**PC #: 88****Public Concern: The Prairie Plan should emphasize the use of native grasses and forbs for sustaining grassland bird populations.**

“My more specific concern and comment relate to the amount of grassland that each alternative envisions leaving in or restoring to cool-season grasses. I have been told that the reason for this would be to keep and attract certain grassland birds. Although research in this area is still inconclusive, the overwhelming majority of scientific publications I reviewed indicate that the preferred habitat for grassland birds is predominantly warm-season grasses and native forbs. There are ample opportunities to achieve the short grass structure needed during specific times of the year for certain grassland bird species through management techniques; use of non-native grass species as proposed in the Management Plan is not necessary and would only hinder overall restoration of the prairie habitat. As the Proposed Management Plan itself states, with ‘only one tenth of one percent of Illinois’ original Tallgrass prairie remaining in scattered small fragments, Midewin stands to be the only opportunity to make substantial contributions to restoration and recovery of these threatened resources.’ (Page 1-11) By using non-native species, the Forest Service will lose this important opportunity. Fortunately, the weight of the research indicates that using native warm-season grasses and forbs will not have an adverse impact on the long-term survival and use of grassland birds. In fact, the contrary appears to be true: native warm-season grasses are essential for sustaining grassland bird populations.” (Preservation/Conservation Organization, Saint Louis, MO - #63)

**Agency Response:**

Native grassland birds were initially adapted to using native grasslands (e.g. prairie). Unfortunately the Midwestern prairies no longer exist or consist of small remnants, or exist in the highly degraded condition now found at Midewin National Tallgrass Prairie. Because most of the prairie habitat has been lost to development over the last 150 years, grassland birds have acclimated to non-native cool season grasslands (pastures and hay fields). The prairies at Midewin will be reconstructed by eliminating invasive plants and planting native species from crop fields or heavily reconstructed. Short-stature grassland birds and medium-stature grassland birds pose a major concern, as these species do not adapt well or use tall grass dominated grasslands that usually result from early prairie reconstructions.

Restoration of the prairie ecosystem at Midewin National Tallgrass Prairie is going to take time, and restoration and management techniques will need to be developed. To date no prairie has been restored and reconstructed on this scale. For this reason research and monitoring (Prairie Plan 6-1 and Appendix E) at Midewin are crucial and adaptive management will be implemented (Prairie Plan 1-11). We will be breaking new ground and developing innovative restoration and management techniques. In the meantime, we do not want to lose grassland prairie species at Midewin. For this reason portions of Midewin are set aside as grassland (cool season grass) areas.

We hope to manage restored and reconstructed prairies through grazing, fire, and mowing to provide habitat for the short-stature and medium-stature grassland birds. Prairie restoration is still in its infancy, probably about 50 years old, with most of the research having been completed in the past 25 years. A successfully recreated and fully functioning prairie has not been accomplished yet in the Midwest, although there are small reconstructions that are close approximations of prairies have been created. It may not be possible to achieve a fully functioning prairie because of surrounding land use changes, but we want to achieve a close approximation to extent possible in the coming decades.

For the present we believe that cool season grasses provide the best habitat for some of the grassland species, and hope that methods can be developed to use native vegetation in the future. Until it can be shown that native grasses and forbs are successful in providing adequate habitat for grassland birds, cool season grasses will continue to be a management option, the long-term goal being to reconstruct cool season grassland areas to prairie (Prairie Plan 4-27), and managed for short-stature and medium-stature grassland birds (FEIS 2-16).

#### **PHASE OUT AGRICULTURAL LEASES**

“We agree that grazing can occur on Midewin’s grasslands, provided that after phasing out the agriculture leases, such grazing is used only as a management tool to provide grasses of the appropriate height for those grassland birds that require short grasses. We do recommend that a serious attempt be made to establish native grasslands with grasses and forbs of shorter stature in some of the upland sites at Midewin. (The ‘may eventually learn to manage native - short stature grasslands’ is such a weak statement that short grass prairie may never be attempted.) Successful establishment of a short grass prairie of sufficient size should attract Upland Sandpipers and perhaps other grassland birds and would eliminate an absolute requirement for grazing by cattle. We understand that very little has been done in this area, and sufficient seed of many of the early-blooming short *Panicum* species and other appropriate species is likely to be difficult to obtain. We suggest that the hill prairies at Nachusa Grasslands where Upland Sandpipers reportedly have nested be used as a model. It is important to emphasize that there is fairly strong sentiment in the community for the use of bison as the primary grazing animal.” (Preservation/Conservation Organization, Joliet, IL - #58)

#### **Agency Response:**

Livestock grazing is currently being used and will continue to be used only as a management tool (Prairie Plan pp. 3-4, 4-28). We believe that cool season grasses now provide the best habitat for some of the grassland species, but expect that methods will be developed in the future to use appropriate native vegetation. Until management of native grasses and forbs is successful in providing adequate habitat for grassland birds, cool season grasses will continue to be a management option (Prairie Plan 4-27). The knowledge gained from restoration efforts at Midewin and other prairies in the Midwest may provide evidence that these cool season grassland areas can be reconstructed to prairie and managed for short-stature and medium-stature grassland birds (EIS 2-16). In the meantime, we do not want to lose significant grassland prairie species at Midewin.

Restoration goals could be jeopardized if bison were reintroduced before grazing, burning, mowing, and species management patters can be established and adjusted to meet ecosystem management goals. Once the habitat has been restored and the sites cleaned up adequately, plans to reintroduce bison as a grazing animal may be feasible (FEIS 2-6).

#### **PC #: 89**

#### **Public Concern: The Midewin National Tallgrass Prairie should develop a grassland bird management plan that ensures adequate habitat for short-, medium-, and tallgrass-dependent species.**

“IOS [Illinois Ornithological Society] agrees with the Forest Service that Midewin needs to be managed for grassland bird species using a mosaic of short, medium and tallgrass habitats. These habitats should include a mix of both non-native cool season grasses and native vegetation; approximate acreages as identified in Alternative 4 provide an appropriate mix of native prairie and grassland habitat. A specific grassland bird management plan detailing how staff will assure adequate habitat for each species should be developed.” (Preservation/Conservation Organization, Lake Forest, IL - #62)

**Agency Response:**

Although a specific grassland bird management plan has not been developed, conservation assessments for each of the Regional Forester's Sensitive Species have been completed. Experts for each species reviewed these conservation assessments. Six of the Regional Forester Sensitive Species are grassland birds that span the range of short, medium and tall stature grass habitats. Each Conservation Assessment includes management recommendations that are incorporated into the Prairie Plan management prescriptions or standards and guidelines. While the Prairie Plan contains prairie-wide management area prescriptions along with standards and guidelines (Prairie Plan 3-1 through 3-5 and pp 4-2 through 4-19), the conservation assessments focus on management prescriptions for individual species of concern. For example, for upland sandpiper the following habitat management prescriptions were developed in the conservation assessment: "1) maintain large unfragmented areas > 500 ha (1235 acres) totaling at least 1620 ha (4,000 acres) of prime upland sandpiper habitat on a yearly basis within five years of implementation of Midewin Land and Resource Management Plan, 2) maintain the prime upland sandpiper habitat within a mosaic of cover between 10 and 30 cm (4 to 12 in) in height, 3) maintain an average yearly population of 123 pairs of upland sandpipers, 4) cooperate with state and other Federal agencies to determine a grazing animal stocking rate that will maintain a mosaic of grass heights between 10 and 30 cm (4-12 in) tall, 5) provide a low density of fence posts, tree stumps, or rock piles for upland sandpiper display perches within one year of implementation of Midewin Land and Resource Management Plan." These management prescriptions, along with the yearly site-specific grazing and management plans are intended to be utilized in a similar capacity as a specific grassland bird management plan.

**PC #: 90****Public Concern: The Midewin National Tallgrass Prairie should develop restoration techniques that result in native plant habitats that support bird species adapted to non-native cool season grasses.**

"The Forest Service should establish a major research program to investigate and test restoration techniques using native plants that will result in suitable grassland bird habitat. This research should investigate native plant seed mixtures that result in a variety of heights and compositions; management techniques such as fire, mowing, or grazing that will create short grass habitat; and different planting and restoration techniques and their effects on vegetation structure. The objective of this research should be to identify techniques that result in native plant habitats that support the bird diversity and density characteristic of non-native cool season grasses." (Preservation/Conservation Organization, Lake Forest, IL - #62)

**Agency Response:**

One of the four main purposes of the Illinois Land Conservation Act, which is the enabling legislation for Midewin National Tallgrass Prairie, is "to provide opportunities for scientific, environmental, and land use education and research." The first three goals of the Research Needs and Opportunities include the need for research on restoration techniques and strategies, especially those that relate to sensitive species, (Prairie Plan Appendix E). We welcome researchers interested in investigating and testing restoration techniques using native plants for grassland bird habitat. In fact, a number of researchers from area universities and other agencies are using Midewin as a "research laboratory".

Prairie restoration on the scale planned at Midewin is unprecedented. The management approach is adaptable (Prairie Plan 5-4), and new restoration techniques will be developed as part of this approach. Monitoring is integral to adaptive management and is a significant activity at Midewin (Prairie Plan, Chapter 6). From knowledge gained by applied research and from

monitoring results, the staff at Midewin will be able to assess the success of restoration techniques and make appropriate changes in order to restore the prairie ecosystem to the extent possible.

**PC #: 91****Public Concern: The Midewin National Tallgrass Prairie should provide safe perching areas for raptors.**

“In the DEIS 3-7 there is mention of the existence of 4500 telephone poles containing creosote. With fencerows being removed to create contiguous grassland and probably removal of poles, I am concerned about perching areas for hawks. With a landfill going in next to the Prairie with its inevitable methane stacks, there is a danger that raptors will perch on them and be burned. This is an ongoing problem according to SOAR (Save Our American Raptors). Something might be worked out with the County when the landfill is in the planning stages to put higher safe perches in the area. Avian ecologists would know best whether a change in available perches at the Prairie would make a difference in the success of raptors in the area.” (Individual, Joliet, IL - #54)

**Agency Response:**

Abandoned telephone and power poles will be removed over time; however, some will be left as standing raptor perches. Although trees and shrubs can also serve as perches, there will be a net decrease in the number of possible perch sites. However, this decrease is not expected to have a significant impact on raptors found at Midewin. We will continue to address the needs of raptors in conjunction with ongoing prairie restoration efforts (Prairie Plan 4-30).

Although the staff at Midewin seek opportunities to coordinate with adjoining landowners in order to protect prairie wildlife at Midewin the Prairie Plan and FIES address those issues and management activities over which the Forest Service maintains jurisdiction.

**PC #: 170****Public Concern: The Midewin National Tallgrass Prairie should provide safe nesting habitat for raptors and herons.**

“Provide for the protection of raptor(s) nesting habitat and great blue heron rookeries. . . . At least I hope that all rookery nesting herons be given equal protection regardless of the species.” (Individual, Dundee, IL – #66)

**Agency Response:**

We agree that all raptors and heron rookeries should be protected. At this time Midewin National Tallgrass Prairie has a great blue heron rookery. Restoration actions may indeed cause other heron species to develop rookeries at Midewin. Therefore, we have changed the standard to read “heron rookeries” and to address the potential for all rookery nesting herons (Prairie Plan 4-29).

**PC #: 92**

**Public Concern: The Monitoring and Evaluation chapter of the Prairie Plan should require fish surveys for IBI on a 2-3 year cycle and invertebrate surveys for MBI every year.**

“Under the Monitoring and Evaluation chapter, the Water Quality section (6-13) should state the need to survey fish for IBI [Index of Biotic Integrity] every 2-3 years, and invertebrates for MBI [Macro invertebrate Biotic Index] every year.” (Preservation/Conservation Organization, Chicago, IL - #57)

**Agency Response:**

The Final Environmental Impact Statement and Land and Resource Management Plan include benthic macro invertebrates as a Management Indicator and lists water quality, four fish species, and two mussel species among the species or conditions of interest associated with the management indicators (FEIS, Table 1, 3-167 and Prairie Plan Appendix C-4). The Prairie Plan additionally addresses the need to monitor aquatic invertebrates and conditions in perennial streams (Prairie Plan 2-6). Proposed monitoring methods will allow us to track conditions in the streams and detect some changes in conditions, but it may not be clear whether the changes are the result of management practices at Midewin or other outside factors. The frequency of monitoring related to stream quality is based partly on the staff and resources, although more frequent monitoring may be possible in the future.

**PC #: 93**

**Public Concern: The Final EIS should address the effect of ditch removal on frog and toad populations.**

“3-30 of the DEIS Direct and Indirect Effects of Restoration of Floodplains. No. 3 states that removal of ditches will increase water storage on floodplains. While a herp monitor at the Midewin, west of Rt. 53, many of the tadpoles that we observed were in ditches along the roads between the bunkers. The effect of filling in ditches before creating seasonally flooded wetlands in the area may result in a death of frogs and toads. There is no mention of this action effecting populations of animals in the DEIS that I can find.” (Individual, Joliet, IL - #54)

**Agency Response:**

With the assistance of herpetological monitors we have been discovering the locations of critical breeding wetlands for amphibians at Midewin. Removal and restoration of abandoned roads and rail beds will require filling ditches, some of which may be breeding areas for frogs and toads. Although there may be a loss of wetlands in some areas, there will be an overall increase in wetlands. Approximately 1,050 acres of Midewin National Tallgrass Prairie are currently classified as wetlands (EIS 3-19). Alternative 4 will result in 4,980 acres of wetlands (EIS 3-22). Wetland restoration activities have started in several areas (1,077 acres), although no roads or railroads have been removed (EIS 2-10). As roads are removed, there will be sufficient wetlands for frogs and toads, which have the ability to search for new habitat. Additionally, efforts will be made to avoid filling ditches during the breeding season in order to negate direct impacts on the reproduction of herpetological species. We have added a guideline for avoiding construction and earth disturbing activities during the breeding season for prairie fauna (Prairie Plan 4-29).

**PC #: 94****Public Concern: The Midewin National Tallgrass Prairie should require rigorous scientific research for single species introduction programs.**

“The Plan and DEIS indicate that research will be encouraged at MNTP. Since (as indicated above) animal introductions or methods which seek to enhance animal populations are poorly studied (in general), we urge MNTP to require carefully-planned, scientifically rigorous research of any single-species programs that are approved on site.” (Individual, Carol Stream, IL - #55)

**See Agency Response Below**

**PC #: 95****Public Concern: The Prairie Plan should establish a detailed policy for conducting animal introduction and population enhancement.**

“Animals are an important part of the prairie community. Philosophically, actions to introduce animals now absent from MNTP, or to enhance populations now present on MNTP are not much different from introducing or re-creating plant communities. Thus, management plans, which include animal introductions or population enhancement are not at odds with the ultimate goals of MNTP. However, introducing or manipulating populations of native animals should be done with even more caution than is exercised with plant introductions. There are many well-known examples of successful animal introductions (especially large animals, and/or game species by wildlife managers). However, in the field of conservation biology, there is also a growing body of scientific literature indicating that most deliberate introductions involving small animals (especially amphibians and reptiles) have failed. This problem is confounded by a lack of research into the reasons for failure. The Plan and DEIS both address topics which will need to be addressed before animal introductions take place at MNTP. However, both fall short of establishing a detailed policy for determining how animal introductions, or population enhancement will be conducted.” (Individual, Carol Stream, IL - #55)

**See Agency Response Below**

**PC #: 96****Public Concern: The Prairie Plan should limit fauna introductions to species currently or historically existing within the plan area, or species valuable to maintaining the structure and function of restored landscapes.**

“As landscape-level restoration proceeds at MNTP, we hope that a more detailed plan will be drawn to aid a decision-making process with regards to introducing animal species. The Plan and DEIS indicate that MNTP may in the future want to introduce animals other than bison/elk, or Regional Forester Sensitive Species. It is reasonable to expect that MNTP will come under pressure to establish populations of other animals not currently known to occur on site. We urge MNTP to resist future temptation to allow introduction for reasons (e.g., good ‘public relations’) other than conservation of species either already occurring at MNTP, or which are previously documented to have occurred historically elsewhere in the ‘Prairie Parklands Macrosite.’ An exception to this suggestion might include large species (such as bison/elk) which can be valuable to maintaining the structure and function of a restored landscape.” (Individual, Carol Stream, IL - #55)



**Agency Response to PC #94, #95 and #96:**

One of the purposes in the enabling legislation for Midewin National Tallgrass Prairie is: “To provide opportunities for scientific, environmental, and land use education and research.” We welcome researchers who are interested in research on single-species introduction programs.

We agree that any introductions need to be carefully planned and rigorously studied. This is addressed in the Species Restoration guidelines (Prairie Plan 4-24) and individually for many of the Regional Forester Sensitive Species (EIS Threatened, Endangered, and Sensitive Species section 3-101). Plant introduction and reintroduction guidelines are discussed under Native Vegetation Remnants in the Plan (Prairie Plan 4-25).

**PC #: 97****Public Concern: The Prairie Plan should preclude further introduction of existing non-native species.**

“We also hope MNTP will preclude future introductions of non-native species (e.g., ringneck pheasants) which already occur on site anyway, and otherwise add little value to enhancing any aspect of MNTP’s natural areas restoration goals.” (Individual, Carol Stream, IL - #55)

**Agency Response:**

We agree that it would be best if non-native species were not introduced into Midewin National Tallgrass Prairie. However, it may be necessary to keep some non-native species at Midewin, for example cool season grasses for the grassland habitat areas. A guideline that addresses this issue has been added to the Prairie Plan under Wildlife Management Game Species, “Avoid introduction of non-native species principally for game management or recreation alone, and where it may not enhance prairie ecosystem functions” (Prairie Plan 4-30).

**PC #: 98****Public Concern: The Midewin National Tallgrass Prairie should not introduce bison to the planning area.**

“Bison have no place, ever, in MNTP. They would have to be managed. This could mean fencing (fragmentation), ear tags, corrals, vaccinations and harvesting. Bison are also a significant danger to people. Any animal (and plant) introduction should finally become a minimum management situation.” (Individual, Gurnee, IL - #29)

**Agency Response:**

Although Alternative 4 allows for future reintroduction of bison, no definite plans or provisions have been made (EIS 1-13). We have deferred the decision of reintroducing bison to Midewin National Tallgrass Prairie for the present planning period because we think it is too early to make the decision at this time. The possible reintroduction of bison may be considered once restoration is well underway; we would welcome participation in that discussion at that time.

**PC #: 99****Public Concern: The Midewin National Tallgrass Prairie should introduce bison and elk to enhance public interest.**

“My only suggestion regarding the plan is put the introduction of elk and bison on a ‘fast track’ so it can be accomplished as soon as possible. They will be a big attraction in drawing people to Midewin, especially families.” (Individual, No Address - #40)

“Having fielded question about bison from tour members for years, I am sure that bison are a major attraction for visitors. Tour members were very interested in watchable wildlife. Three years ago one tour group showed me the first Midewin color brochure with a picture of bison and wanted to see them. The prairie grassland refuges at Canton, Kansas and Prairie City, Iowa have bison and elk and attract some 50,000 visitors a year. Bison, whether in the viewshed along State RT. 53, or in more remote areas accessible by tram or trail will be an important attraction at Midewin. The potential ‘draw’ of visitors from the 10 million people in the greater Chicagoland area should far exceed that figure. Many of these visitors would also enjoy vistas of the restored prairie, hiking, bird watching and prairie flowers.” (Individual, Joliet, IL - #3)

**Agency Response:**

We agree that bison would become a large draw in attracting visitors to Midewin National Tallgrass Prairie. Alternative 4 neither includes nor excludes the possibility of bison reintroduction. We presently have decided it would be best to defer this decision. Suitable lands must be restored, stabilized, and enclosed in appropriate fencing before the reintroduction of bison could proceed (EIS 2-6). It would take a number of years to provide appropriate habitat and structures for bison. The reintroduction of bison may be considered in future analyses once restoration is further along. We would welcome participation in discussions concerning bison at that time.

**INTRODUCE BISON THROUGH GRAZING PERMITS**

“The introduction of bison should be considered in this plan even if only as included in grazing permits. In the DEIS pages 3-76 and 3-77 all of the positives of having bison on the prairie are given. What a vision of the prairie - people would have if grazing areas could be planned within view of one of the pull-offs or trams. It might be enough to get people to buy into the entire prairie experience and to more closely examine the entire ecosystem: plants, insects, birds, etc. This is an opportunity missed if omitted from the Plan. Dealing with the creation of prairie through the tedious process of seed production, soil preparation, planting etc. is indeed an immense challenge, but a fairly ‘safe’ undertaking. Introducing bison may seem more ‘risky,’ but has exciting possibilities and since we have been led to believe that this might happen from the very beginning, it would probably be the best move that the Midewin could make to get the support of the entire region. There are certainly other entities who have bison, from whom we could gain expertise. The bison could be part of a grazing contract and worked into the budget as such. I encourage the U.S.F.S. to accept the challenge and add a spark of excitement to the Plan. If bison are not in the current Plan, they may be impossible to add later.” (Individual, Joliet, IL - #54)

**PC #: 100****Public Concern: The Midewin National Tallgrass Prairie should establish experimental plots to examine the effects of bison and elk on plant habitat structure and maintenance.**

“IOS [Illinois Ornithological Society] agrees that it may be too early to determine if bison or elk should be introduced. However, IOS recommends that the Forest Service proceed with experimental plots where bison and elk are introduced to examine their effect on native plant habitat structure and maintenance. Such information is needed in order to make an informed decision on permanent introduction and if grazing will

create and maintain suitable shortgrass habitat.” (Preservation/Conservation Organization, Lake Forest, IL - #62)

### **Agency Response:**

It would be advantageous to acquire information on bison and elk grazing and impacts on native plant habitat structure and maintenance. Unfortunately, at present we do not have enough large patches of native prairie vegetation to support a project such as this. Once we have increased the amount of prairie at Midewin, such a project could be considered.

Continued public interest and comments related to bison have resulted in some minor changes in the Land and Resource Management Plan. We realize there is a need to explore the possibility of using bison for grassland management at Midewin. The definition of livestock now includes “domestic bison,” and bison could be used as an “experimental” grassland bird habitat management tool under agricultural special use permits. We also realize there is a need to gather additional information on bison and their effects on resources. Bison effects on grassland bird habitat and other sensitive species is a research goal we will need to address prior to reintroducing bison at Midewin. Introducing bison, even under special use permit authorizations, is a risky undertaking, and proper fencing would be needed to keep people a safe distance away from these large animals. Prior to using bison as livestock for grassland management under special use permit; site-specific effects will require analysis in compliance with the National Environmental Policy Act.

### **PC #: 101**

#### **Public Concern: The Final EIS should include an initial estimate of acres allocated for bison grazing permits.**

“It may be necessary for Midewin leadership to assist in prioritizing what should be monitored in any given year . . . (see agricultural use-special use and grazing) permits. Note: It has long been considered by ‘Midewin Leadership’ that one possible way to maintain in modest sized bison herd at Midewin would be under grazing permits that could be adjusted to encourage grazing by bison, rather than cattle. Table 6-1 should reflect this under agricultural use including an initial estimate of acres allocated to special uses. Other Midwestern refuges in Kansas and Iowa seem to allocate 12 to 20 acres per head for bison elk.” (Individual, Joliet, IL - #17)

### **Agency Response:**

We agree that one way to introduce bison to Midewin National Tallgrass Prairie would be through the agricultural special-use permits. If an individual were interested in grazing bison instead of cattle, we would be interested in examining such a proposal. However, a decision to reintroduce bison on a large scale to Midewin has been deferred at this time (EIS pp. 2-6). As discussed above in the Agency Response to PC #100, we realize the need to gather additional information on the effectiveness of bison on grassland bird habitat. We have added a guideline to the Prairie Plan that considers bison on a portion of Midewin on an experimental basis only (Prairie Plan 4-28), and we have added a Research Goal in the Prairie Plan appendix referring to bison. A proposal to utilize bison as livestock for grassland management would still have to be analyzed through the National Environmental Policy Act (NEPA) process, and acres proposed for this allocation would be determined during the NEPA process.

**PC #: 102****Public Concern: The Midewin National Tallgrass Prairie should introduce the prairie chicken.**

“Bring back the prairie chicken.” (Individual, No Address - #12)

**Agency Response:**

A decision on whether to attempt a reintroduction of prairie chickens has been deferred at this time. Substantial restoration work is necessary before there is enough appropriate habitat for prairie chickens. Once there is enough habitat, we will re-examine the potential for reintroducing prairie chicken, and we will then solicit comments from the public.

The Illinois Department of Natural Resources is presently studying the possibility of reintroducing prairie chickens in various locations within the state. Midewin National Tallgrass Prairie is one of the sites being studied. We will use this study, once it is completed, to help us with our decision on the possibility of reintroducing of prairie chickens at Midewin in the future.

**PC #: 103****Public Concern: The Midewin National Tallgrass Prairie should encourage the proliferation of wild turkeys.**

“Encourage the proliferation of wild turkeys” (Individual, No Address - #12)

**Agency Response:**

Midewin National Tallgrass Prairie presently maintains a healthy population of wild turkeys. Restoration and management will not emphasize this native species over others, but there should be sufficient habitat to ensure a viable population.

**PC #: 104****Public Concern: The Midewin National Tallgrass Prairie should limit public access to wildlife habitat areas.**

“Alternative 4, found in Chapter 2 pages 21-22, provides an appropriate mix of grassland habitat and prairie restoration to support a variety of wildlife, including increased habitat acreage for all of the Regional Forester Sensitive Species. However, the large number of recreation opportunities offered in alternative 4 listed in Chapter 2 page 32 including 48 miles of trails, campgrounds, dispersed camping, visitor center, equestrian trails, and bicycle trails could fragment and disturb the habitat that is created. Bicycle trails and equestrian trails can erode soils, and have an overall negative effect on the habitat patches created. I realize that some degree of development must be undertaken to allow visitors access to the area, but too much access could negate the positive goals desired by the plan including increasing grassland bird populations and increasing biodiversity in the area.” (Individual, Urbana, IL - #53)

“Many species of grassland birds require large, unfragmented tracts of grasslands in order to reproduce successfully (Herkert, 1994). Human disturbance to wildlife can also negatively impact reproductive success (Gill et al., 1996). Increased fragmentation adds edges to the landscape and can increase predation levels (Martin, 1992). Alternative 6 provides for the most undisturbed habitat, but does not allow for the needed mix between taller and shorter grass habitats. I believe the goals set forth in the DEIS would best be achieved by an alternative with the habitat restoration levels of alternative 4, but with less development of the area. The best compromise in this plan would be to keep the miles of trails to a minimum level, but also to restrict the trails to the perimeter of the restored habitat areas. By keeping the trails close to the borders of the restored areas, the core habitat would not be disturbed by humans and the continuous grass expanses

needed by many grassland bird species could be maintained. In conducting research at Him Edgar Panther creek State Fish and Wildlife Area, I have seen the site go from undeveloped to largely developed. I understand the need to attract visitors to the site, but if there is too much development the quality of the outdoor experience decreases. This site, being near the Chicago region will surely attract a great deal of visitors, but large amounts of development will detract from the natural beauty and wildlife that many people will want to enjoy.” (Individual, Urbana, IL - #53)

### **Agency Response:**

In selecting Alternative 4, we balanced the need for wildlife habitat with the demand for public use at Midewin. The more fragmenting and wider multi-use trails (hiking with bicycle and/or equestrian) are located on the perimeters of the unfragmented tracts. Only hiking trails have been proposed within the unfragmented tracts to limit human disturbance of wildlife. The trails on the planning maps are still in the conceptual stage, and trail development at Midewin will occur gradually. The Forest Service has the responsibility to evaluate and determine the impacts that site-specific projects such as trail development will have on the environment. This will be completed through the NEPA process as site-specific trail projects are proposed.

Recreation was identified as one of Midewin’s purposes under the legislation establishing Midewin. The four purposes as outlined in the Illinois Land Conservation Act have been the driving force throughout the planning process. Recreational activities have been planned to be compatible with the other purposes. Proposed developed areas at Midewin including a group campground and visitor center and native seedbed gardens were intentionally placed around the edges of Midewin National Tallgrass Prairie to avoid fragmenting habitat. Trails were divided into two types: 1) hiking trails or narrow grass tracks, and 2) multi-use trails for biking and equestrian use. Hiking trails, because they are narrow, are not considered fragmenting, while the wider multi-use trails are considered fragmenting. Under Alternative 4, of the 48 total trail miles, 20 are hiking-only trails.

The Prairie Plan calls for the restoration and maintenance of 10,260 acres of unfragmented grassland habitat (Prairie Plan 3-1). Unfragmented grassland areas are defined as 500 acres and larger in size, with limited woody vegetation, having no roads or multiple-use trails, and no high use development (Prairie Plan 4-27). Development that is considered fragmenting would have to take place outside the unfragmented areas.

Trails will be designed, constructed and maintained to protect the natural resources of Midewin. Erosion control measures will be constructed (Prairie Plan pp. 4-8 through 4-10). Trails will be monitored to determine impacts on natural resources, followed by appropriate actions, such as trail closure to stop or reduce impacts (Prairie Plan 4-8).

### **IMPACTS ON AMPHIBIANS AND REPTILES**

“Starting with the concept that you start with a ‘large’ proposed restoration and management area that looks large on paper, then, when all the facilities are added, all of a sudden it’s not that large anymore. With this in mind, I think the most unbroken (least fragmented) managed habitat will, in the long run, support more of the less mobile, area-restricted species (i.e., amphibians and reptiles). The more mobile of these, such as blue racers (present at Midewin), are active animals with large home ranges, which would suffer significant road mortality if too many access roads, parking facilities and trails were added. I would therefore support 3 parking areas and 5 access points to reduce/confine traffic and not spread it around the various roads leading in and out of the site. . . . Amphibians and reptiles need a mosaic of habitats (wetland, lowland, upland) that are unbroken by roads and paved trails as possible, as they cannot fly and are susceptible to potentially severe bi-seasonal (spring and autumn) road/trail mortality as they move from foraging areas to hibernacula and vice versa in the fall.” (Individual, Winnetka, IL #2)

**Agency Response:**

Public vehicular access will be limited at Midewin National Tallgrass Prairie to the developed areas and access points in Management Area 2, (Prairie Plan Figure 2). Alternative 4, the selected alternative, provides for seven public access points; six of these access points have associated parking lots. With the exception of the seed production area parking and possibly the visitor center parking areas, these parking lots and access points are on the periphery of Midewin National Tallgrass Prairie. The only non-administrative road within Midewin will be the shuttle road. There will be very few opportunities for reptiles and amphibians to come in contact with vehicle traffic, as speeds on the shuttle route and administrative roads will be slow so that animals in the roads can be easily avoided. Trails and roads are not expected to restrict movement of amphibians and reptiles. Additionally, educational programs will be developed to inform trail users of wildlife at Midewin and how to avoid disturbing wildlife encountered.

Most of Midewin National Tallgrass Prairie will be restored to a matrix of wetlands and uplands (Management Area 1; (Prairie Plan 3-1). Large portions of this management area will consist of a landscape unfragmented by multiple use trails or development. A minimum of 9,500 acres will be maintained as unfragmented lands. Only narrow hiking trails will be allowed within these areas.

**PC #: 105****Public Concern: The Midewin National Tallgrass Prairie should provide scenic pull out areas around the perimeter of the management area to avoid habitat fragmentation.**

“Even with the interpretive and public transportation system, some visitors to Midewin may choose to or may have to experience Midewin from their automobile. To accommodate these visitors and to avoid fragmenting Midewin with roads and development that would impair natural areas, scenic pull out areas should be considered. The pull out areas should be from roads surrounding Midewin (Route 53, Hoff Road, etc.) and should be chosen to highlight different aspects of Midewin. These areas should be designed in order to provide isolation from the noise and distraction of the adjoining highways. Perhaps some of the proposed public access points could be modified to also serve as scenic pull out areas.” (Individual, Tinley Park, IL - #25)

“The nine public access points to the prairie located on the perimeter roads in Alt. 4 are adequate to provide visitors a trailhead to take them on foot or by bike into the prairie. It is suggested that the access points be developed as pull-offs that would provide a scenic overlook of the prairie to visitors in autos. Development of appropriate pull-off areas would eliminate the need for an interior auto route and provide handicapped visitors with access.” (Preservation/Conservation Organization, Chicago, IL - #28)

**Agency Response:**

Although scenic pull-offs are not specifically addressed in the Prairie Plan, they would be compatible with the Plan if placed at the periphery of area. Some of the access points with parking areas may also incorporate scenic overlooks, and the visitor center locality will also provide scenic vistas for visitors. Small developments around the periphery of Midewin are not identified during programmatic planning phases. The Forest Service will consider developing scenic pull-offs at the site-specific planning level. At that time, public involvement would be requested to consider alternatives for scenic pull-offs.

**PC #: 106****Public Concern: The Midewin National Tallgrass Prairie should construct a motor vehicle by-pass to benefit animal dispersal.**

“Since the site is bisected by Route 53, has any thought been given to an underpass or car bridge to allow animal movement/dispersal? I realize this is big bucks, but it could be justified.” (Individual, Gurnee, IL - #29)

**Agency Response:**

We realize that Route 53 poses a barrier to wildlife movement at Midewin and that animal dispersal may become more of an issue as restoration proceeds. As more habitat is restored, there will be corresponding increases in wildlife populations. Illinois Route 53 is under the jurisdiction of the Illinois Department of Transportation, and we anticipate working with that agency on this issue. Although a crossing is planned by means of a bridge for passage by larger mammals, we will need to study ways to address passage by smaller mammals and herpetological species.

**PC #: 107****Public Concern: The Midewin National Tallgrass Prairie should construct observation towers, in lieu of trails, to reduce habitat fragmentation.**

“Observation towers. Could these be used to provide ‘access’ to areas without building trails etc. to fragment or degrade the habitat?” (Individual, Riverdale, IL - #16)

**Agency Response:**

Large unfragmented areas are provided under Alternative 4 and include approximately 10,260 total acres within five different tracts (Prairie Plan 3-1, EIS 2-21). We believe these unfragmented tracts will be adequate to maintain viable populations of prairie wildlife. Other smaller areas (less than 500 acres) will also provide some habitat for prairie wildlife. The planned configuration of unfragmented habitat and trails should not adversely impact the prairie wildlife (Final EIS 3-221), as only narrow hiking trails will be located within unfragmented areas. Wildlife observation platforms may be considered for the future as restoration proceeds at Midewin.

## 11. Recreation

**PC #: 108****Public Concern: The Midewin National Tallgrass Prairie should provide proactive and intensive environmental educational programs for recreational users.**

“Alternative 4 appears to allow for ample recreational opportunities while still balancing the goals of ecological restoration and conservation through landscape-scale management. Provision of enjoyable outdoor recreational opportunities should continue to be a major goal of MNTTP. However, as the site becomes accessible to the region’s growing population and various organized special-use groups, it is predictable that maintaining a good balance between recreation demands and natural resource needs will become an increasing challenge, and will probably lead to enforcement problems. Examples of similar problems (unauthorized equestrian or bike use of undeveloped trails) are well known in several county preserve districts elsewhere in the region. Enforcement of on-site rules and regulations is one approach to curbing these problems. Based on our own observations in the region, it is doubtful that this approach alone will be adequate. Intensive education of recreational users and use-groups may be needed to ensure that

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they are sensitive to the natural resource mission of MNTP, and we urge MNTP to be proactive in this regard.” (Individual, Carol Stream, IL - #55)

### **Agency Response:**

Environmental Education is one of the main purposes of Midewin set forth in the enabling legislation. Education of recreation users to ensure that they are aware of the resources of Midewin is addressed in Chapter 2 of the Prairie Plan. The Vision states the following: “The vision includes restoring the ecology of the Prairie thereby promoting sustainable ecosystems, conserving populations of fish, wildlife and plants, providing for scientific, environmental and land use education and research, and providing a variety of recreation opportunities that enhance the visitors’ appreciation of the prairie ecosystem” (Prairie Plan 2-2). Expansion of this concept is being developed in the Master Interpretive Plan for Midewin. Additionally, the Forest Service at Midewin continues to take a proactive approach to cultural and natural resource conservation issues through education programs such as “Leave No Trace Camping” and “Tread Lightly”. Recreation and law enforcement staff will encourage and enforce rules and regulations so that all visitors can enjoy Midewin’s resources in the years to come. We encourage local communities, partners, and volunteers to contribute to our efforts to educate and inform visitors and users of the fundamental importance of biodiversity and plant conservation.

### **PC #: 109**

#### **Public Concern: The Midewin National Tallgrass Prairie should implement management prescriptions to protect and enhance the natural environment as well as provide balanced and ecologically sensitive recreation opportunities.**

“IOS [Illinois Ornithological Society] recognizes the critical importance of Midewin National Tallgrass Prairie to the future of bird populations in Illinois and the Midwest. It is well known that the current habitats at Midewin maintain some of the highest populations of grassland and shrubland birds in the state including several endangered or threatened species. In addition, Midewin holds the potential to provide critical habitat for these species in the future as additional land is restored to natural habitat. Midewin also provides a unique educational and recreational opportunity for the public to experience Illinois’ natural heritage through the restoration of the native prairie ecosystem on a scale not previously possible. . . . It is critical for the U.S. Forest Service to develop and implement a long-term management plan that first protects and enhances the natural resources of the site, and second, provides for balanced and ecologically sensitive human recreation.” (Preservation/Conservation Organization, Lake Forest, IL - #62)

### **Agency Response:**

The enabling legislation for Midewin National Tallgrass Prairie, The Illinois Land Conservation Act, and outlines four purposes. The first is to “manage the land and water resources to conserve and enhance native wildlife, fish and plant populations and habitat”. This concept is established in the Prairie Plan through the goals, objectives, standards, and guidelines.

The fourth legislated purpose of Midewin is to “provide a variety of recreation opportunities that are not inconsistent with the previous three purposes. We believe that Alternative 4, the selected alternative, provides the best mix of protection and enhancement of the natural resources, while still providing for a unique set of outdoor recreational opportunities. The Land and Resource Management Plan provides guidance and direction on recreational development and includes the following guidelines:



Recreation Guideline #2. "Recreation activities may be restricted, prohibited, or relocated based on monitoring results to protect human safety, natural resources and sensitive species" (Prairie Plan 4-8).

Trail Guideline #2. "Trails shall be designed, constructed and maintained to the Forest Service Design, Construction, and Maintenance standards appropriate for the type and amount of use on soil and topography of the area of concern. Trails will be designed and constructed to protect the natural resources of the area and to adequately and safely accommodate the most demanding type of designated use" (Prairie Plan 4-8).

**PC #: 110****Public Concern: The Midewin National Tallgrass Prairie should restrict recreational activities that conflict with the goals and objectives of the Prairie Plan.**

"Alternative 4 provides an appropriate balance between recreational use of the site and the need to ensure the ecological integrity of its natural communities. IOS [Illinois Ornithological Society] believes it is totally appropriate to limit or prohibit certain recreational human activities on the site that conflict with the goals and objectives of the Prairie Plan. Some examples include off-road vehicles, motorized trail vehicles or boats, commercial use other than agriculture, upland bird or waterfowl hunting, unlimited off-leash dog access, and collecting or taking of wildlife or plants." (Preservation/Conservation Organization, Lake Forest, IL - #62)

**Agency Response:**

Alternative 4 emphasizes a balance of habitat for grassland bird species and native prairie restoration, with a moderate amount of recreation development. Recreation is an integral part of the Prairie Plan, as directed by the enabling legislation ("To provide a variety of recreation opportunities that are not inconsistent with the preceding purposes"). Standards and guidelines have been developed to guide allowable recreation uses (Prairie Plan pp 4-8 through 4-10). One recreation objective is to "provide non-motorized recreation opportunities". Enforcement of road and area closures will be necessary to meet this objective. The Prairie Supervisor may close or restrict use and access to areas in order to protect threatened, endangered or sensitive species, ensure public health and, safety or property (36 C.F.R. §261.53). Also for the protection of plants and animals of concern, the public, and property, pets will be limited to designated areas (Prairie Plan 4-31) and limited to Management Area 2 under enforced leash requirements (Prairie Plan 4-33).

Commercial recreational use will be considered on a case-by-case basis through the special use permit system. Special use applications will be reviewed for compatibility with the Prairie Plan, the Illinois Land Conservation Act and compliance with the National Environmental Policy Act (Prairie Plan 4-14).

All forms of hunting, fishing, and trapping will be coordinated with the Illinois Department of Natural Resources to ensure that the type, distribution, timing, and intensity will not impact ecosystem and species management. The Prairie Supervisor may suspend harvest of game wildlife, when harvest conflicts with the goals or activities of restoration projects and ecosystem management at Midewin (Prairie Plan 4-30). For instance, game and non-game species may be collected or harvested by permit only (Prairie Plan 4-30).

Plant collecting will be prohibited unless collection permits are issued to ensure that plant collecting does not jeopardize the continued vigor or existence of any native plant population or associated plant or animal communities (Prairie Plan 4-4).

**PC #: 173****Public Concern: The Midewin National Tallgrass Prairie should address the need for additional law enforcement for the Prairie.**

“A large commitment to law enforcement will be needed to protect all the important resources and outdoor activities that will be available at Midewin. Without a visible law enforcement presence the size and shape of Midewin will make it hard to control and contain illegal access, poaching, wildlife harassment, and vandalism. This is an issue that the Forest Service and its partners need to have well-reasoned and planned out before it opens its doors to the public.” (Illinois Natural History Survey, Champaign, IL – #67)

**Agency Response:**

A full time law enforcement position has been established at Midewin National Tallgrass Prairie to enforce applicable federal laws and protect the public and the resources. Additional law enforcement personnel could be detailed to work at Midewin. Local law enforcement agencies can also be called on to assist, should the need arise.

**PC #: 111****Public Concern: The Midewin National Tallgrass Prairie should provide an equitable range of recreational opportunities.**

“While we do not object to hunting at the Midewin for management purposes, there must be a balance in use of the site for recreational purposes.” (Preservation/Conservation Organization, Joliet, IL - #47)

“The plan notes, and we agree, that Midewin lies within an urbanizing area and the demand for recreation on it is ‘due to its proximity to Chicago and surrounding suburbs.’ This demand takes the form of various types of recreation, from nondeveloped, rustic activities such as hiking and site seeing, to developed recreational opportunities such as biking and camping. We believe that Midewin has the potential to meet the entire spectrum of recreational opportunities without significant adverse effect to its natural resources. The Village of Elwood plans to support Midewin through additional recreational opportunities that compliment the Plan outside its borders, such as the development of trail connections, and camping facilities including equestrian campsites.” (Village of Elwood, Elwood, IL - #52)

**Agency Response:**

Alternative 4, the selected alternative, provides for the four purposes directed by the enabling legislation, including “recreation opportunities that are not inconsistent with the previous three purposes”. Based on Alternative 4, the Prairie Plan provides a spectrum of recreation opportunities. As stated in the Recreation, Interpretation and Scenic Integrity Goals and Objectives, Midewin will provide orientation, interpretation, and environmental education opportunities that enable people to develop an understanding and appreciation of the Prairie ecosystem and the human role in sustaining prairie resources (Prairie Plan pp. 2-8 through 2-9). Midewin will also provide camping opportunities, picnic areas, and a network of trails. Ample opportunities to view and learn about the prairie landscape and the cultural heritage of the area will be provided through 20 miles of hiking only trails, 5 miles of bicycle and hiking use trails, 5 miles of equestrian and hiking trails and 18 miles of multiple use trails. A visitor center will serve as the hub of Midewin’s recreational and educational activities.

**PC #: 112****Public Concern: The Midewin National Tallgrass Prairie should develop a recreational trail system that provides educational opportunities to a wide range of users.**

“Openlands believes that the Midewin trail system should be designed in such a way as to provide users an opportunity to experience the Prairie and its unique natural resources. While the primary goal of the enabling legislation is restoration, management, and conservation of the land and water resources of Midewin, related goals are to provide a variety of recreation experiences not inconsistent with these other goals, and to provide opportunities for scientific, environmental and land use education. In order to accomplish this, the trail system should be planned and designed from the outset to provide an opportunity for recreation, education and restoration, in order to be inviting to hikers, bikers, equestrians, and casual visitors alike. It should include appropriate facilities and opportunities, including developed interpretive exhibits, and possibly, a living history site or sites. Openlands Project supports the trail system as proposed in Alternative 4. When considered as a system the Plan includes an adequate number of trails, encompassing hiking, biking, and multi-use mileage.” (Preservation/Conservation Organization, Chicago, IL - #57)

“Recreational trails can, if properly installed and managed, be a valuable tool in educating the public about Midewin’s prairie ecosystem and the need to restore and preserve prairie as part of our natural heritage. Through the use of the proposed Midewin trail system, visitors will have the opportunity to discover that prairie is much more than a field of grass with grazing bison. Recreational trails should be developed in a manner to ensure that visitors leave the Midewin with a positive, memorable experience. A positive experience can result in visitors wanting to return to the Midewin with their friends. With the support of visitors and volunteers, Midewin might be funded so as to reach its optimum potential. It is possible that Midewin could even become a model for other prairie restoration projects elsewhere in the country. Through an interpretive trail system, visitors can experience the prairie’s varied and extreme seasonal moods. Trails can truly be the paths that provide visitors with the better understanding and appreciation of the living prairie that will be Midewin. If visitors are ensured of having an enjoyable experience at Midewin, tallgrass prairie may join mountains and seashores as a desirable vacation destination.” (Individual, Wilmington, IL - #27)

**Agency Response:**

The recreation aspects of the Prairie Plan are intended to provide a variety of recreational opportunities to diverse groups of users. The Prairie Plan describes the desired condition:

“Recreational activities are at a level that maintains desired ecological conditions. Efforts are made to educate and inform visitors and users of the fundamental importance of biodiversity and plant conservation to society. Local communities, partnerships, and volunteers are involved and benefit from their roles in restoring and maintaining the prairie ecosystem.”

“Visitors find opportunities for outdoor recreation in a unique setting. Visitors experience a sense of vastness and solitude in a more naturally appearing setting not found elsewhere in this vicinity. Experiences include opportunities to view the prairie landscape and wildlife from Illinois Route 53 or from a network of internal trails, and opportunities to become totally immersed in the prairie environment. Midewin provides trail opportunities unencumbered by vehicle traffic, with opportunities for both short, easy trips as well as more challenging trips by foot, bicycle or horseback. The landscapes offer a variety of naturally appearing settings from rural and roaded natural settings with opportunities for social interaction and comfort, to somewhat more primitive settings with greater opportunities for solitude and challenges.”

The combination of restored prairie ecosystems, coupled with safe, attractive recreational developments and educational and interpretive programs provide recreational opportunities that enhance the visitor's appreciation of restoring, maintaining, and enjoying the tallgrass prairie ecosystem (Prairie Plan 2-8).

Interpretive and educational opportunities will be further addressed in the Master Interpretive Plan for Midewin, which will define goals and objectives for interpretive and environmental education programs. Recommended story lines and presentation methods to guide effective program development will be outlined. The Prairie Plan and the Master Interpretive Plan will be used in conjunction, with one another at the project level when site-specific planning is undertaken.

**PC #: 113****Public Concern: The Midewin National Tallgrass Prairie should establish and enforce guidelines that prevent recreational over-use of the Prairie.**

“Does the Forest Service have a policy on over-use by any recreational user group? What is the maximum number of cyclists, cross-country skiers, joggers, hikers and equestrians that Midewin can accommodate on a single day? How would the Forest Service deal with an equestrian or biking rally that will bring 100 or more users to Midewin on a single day? Would special permits be issued to user groups bringing large numbers of visitors to Midewin for an event? Should day-use permits be required for individual equestrians and bikers to control per-day numbers, such as those issued on many National Forest Service properties? It is suggested that the Forest Service establish guidelines and controls to prevent damage from over-use, and it should give itself the authority to change designated trail use in the event of damage to habitat or disruption of wildlife.” (Preservation/Conservation Organization, Chicago, IL - #28)

**Agency Response:**

With no history of unescorted recreational use, Midewin will have to conduct visitor use and impact studies as the site is opened in order to develop recreation capacities for the various uses. The Prairie Plan recognizes the need to research and allocate recreational use capacities, as stated in the Recreation Goals and Objectives: “Identify recreation capacities and appropriate use allocations for commercial and non-commercial recreation uses and identify or provide management strategies to implement when capacity is exceeded,” (Prairie Plan 2-6). Any large group use (75 or more) will need to apply for a special use permit. The Prairie Supervisor may authorize permits provided the use is in compliance with the Prairie Plan and applicable laws, rules, and regulations (36 C.F.R. §251). Requested recreational uses may need to be analyzed for environmental impacts in compliance with the National Environmental Policy Act.

To address recreational over-use and safety issues, the Prairie Plan includes the following guideline: “Recreational activities may be restricted, prohibited, or relocated based on monitoring results to protect human safety, natural resources and sensitive species...” (Prairie Plan 4-8).

**PC #: 114****Public Concern: The Midewin National Tallgrass Prairie should consider designing trails as firebreaks.**

“Has the relationship between prescribed burning and trails been considered? Trails can be effectively used to define management areas so that trails themselves can act as a firebreak.” (Preservation/Conservation Organization, No Address - #49)

**Agency Response:**

Site-specific burn plans will be completed prior to all prescribed fires at Midewin in accordance with Forest Service requirements. Burn plans provide specific information on firebreaks, including the use of roads and abandoned rail beds. Some trails may be considered in individual burn plans for use as firebreaks, if deemed suitable for such use.

**PC #: 115****Public Concern: The Midewin National Tallgrass Prairie should construct fire resistant boardwalks for access to sensitive areas.**

“Construction of fire resistant ‘boardwalk’ trails at selected high use access points and at selected sensitive areas would be attractive to most visitors, including those visitors that might be handicapped or are not comfortable in ‘natural areas.’ In addition, visitors would be more likely to stay on a boardwalk and would be less likely to stray into sensitive areas. We feel that an auto loop is not appropriate, but a boardwalk may satisfy those who would argue for an auto loop to accommodate the elderly and handicapped. An auto loop would cause habitat fragmentation, and autos and motorcycles would negatively impact the prairie experience for nearby trail users. A boardwalk would provide access with limited negative impacts.” (Individual, Wilmington, IL - #27)

**Agency Response:**

We agree that an auto loop would not be appropriate. Therefore an auto loop is not part of the selected alternative. As all programs and facilities at Midewin must meet federal laws related to accessibility standards, The Prairie Plan includes a standard to comply with the Americans with Disabilities Act Accessibility Guidelines (Prairie Plan 4-8). A fire resistant boardwalk as an interpretive trail could be one means to encourage expanded visitation at Midewin by persons with limited mobility. However, decisions regarding access to sensitive areas, designs for the types of use, and construction materials will be made at the project level.

**PC #: 116****Public Concern: The Final EIS should include a discussion of transportation options for access to the Prairie.**

“Although transportation corridors are illustrated (Figure 6), the Plan should include a discussion of the transportation context for the Midewin facility and, in particular, accessibility to the site. In particular, we believe you should address both short- and long-range ideas for public transportation access to the site. While it is recognized that you are not responsible for such accessibility options, you should include at least a reference to discussions that you have held with public transportation providers. Short-term access might include extension of the Metra Southwest Service to the Midewin National Tallgrass Prairie.” (Northeastern Illinois Planning Commission, Decatur, IL - #21)

**Agency Response:**

The Prairie Plan for Midewin applies only to those lands owned and administered by the USDA Forest Service. The Prairie Plan includes objectives for to coordinate transportation system planning, management, and decommissioning with other federal, state, and county agencies, permittees, contractors, cooperators, and the public to develop a shared transportation system serving the needs of all parties (Prairie Plan 2-11). The Forest Service will continue to discuss the concept of rail access to Midewin through a possible extension of the Metra Southwest Service with appropriate parties.

**PC #: 117****Public Concern: The Prairie Plan should require a shuttle service for visitor access to the Midewin National Tallgrass Prairie.**

“The District is also pleased to see a shuttle service proposed rather than an auto loop tour, as this will reduce congestion, reduce consumption of fossil fuels, and promote air quality issues.” (Forest Preservation District of Will County, Joliet, IL - #18)

**Agency Response:**

The selected alternative includes a shuttle system, which will significantly reduce habitat affected by transportation, meeting the needs of visitors to Midewin. A site-specific environmental assessment will be completed prior to project implementation to determine the effects that development of a shuttle system will have on Midewin's natural and cultural environment. The design and operation of the shuttle will include such variables as route, vehicle type and size, operating hours, cost, environmental effects, and projected use. The Master Interpretive Plan and Market Analysis being completed concurrently to the final Prairie Plan will provide guidance for development of the shuttle system.

**PC #: 118****Public Concern: The Prairie Plan should provide adequate linkages to other regional roads, trails, and natural areas.**

“Ensuring Midewin has adequate trail linkages to other regional roads, trails, and natural areas is necessity at this stage of its development, and of the development of the region. As suburban sprawl moves in and potentially engulfs the region, trails can provide a most important dual function. They can adequately address the recreational needs of the region, while providing an alternative transportation corridor, allowing people to walk or bike to work and recreational areas. Regarding crucial trail linkages, the Plan is still deficient in several areas: 1. The plan should provide for a multi-purpose trail connection to the northeast corner of Midewin, to allow for communities north of Midewin to connect to the Des Plaines Conservation Area. This linkage would ensure that Midewin is incorporated into a developing regional trail system. The Illinois Department of Natural Resources (IDNR) has embarked on steps toward master planning the Des Plaines River Conservation Area. Planning trail linkages must take this into account. 2. Western connections are crucial because opportunities to cross rail lines, interstate highways, and the Des Plaines River system are limited—they are enormous physical boundaries. Midewin controls certain critical access points, and the region depends on Midewin to assist in providing trail corridors to existing crossings in order to provide adequate access to the prairie from surrounding communities. 3. Openlands believes that there are two crucial crossings that are not addressed in the plan. Openlands proposes that Midewin maintain an option in the future to locate a trail towards Blodgett Road's crossing of either Grant Creek or the rail tracks. Providing a trail across Drummond Road at the northwest corner in the short term is also critically important to the sub-regional trail plans of local governments north of Midewin, such as the Village of Elwood. A proposed trail comes through Elwood and should be considered in Midewin's planning process. 4. The Draft EIS should show the adopted regional and sub-regional trail plans that affect Midewin, such as the 1997 Northeastern Illinois Regional Greenways and Trails Plan. The 2001 Jackson-Elwood-Manhattan-Channahon Trails Plan is likely to be adopted in the near future.” (Preservation/Conservation Organization, Chicago, IL - #57)

“Most trail users look forward to linkages to MNTP from the Will County Wauponsee Trail. It makes much more sense to develop trails that would link to the Wauponsee first, before developing non-linking trails or not putting in the connections until later.” (Individual, Channahon, IL - #60)

**Agency Response:**

The Midewin Land and Resource Management Plan includes a multi-use trail at the northeast corner of Midewin (Prairie Plan Figure 6, Transportation and Trails Corridor). From here, the

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multi-use trail traverses Midewin, crosses Illinois Route 53 at the railroad bridge, and connects to the Des Plaines Conservation area along River Road. Though the Prairie Plan provides overall guidance for a trail system and connections, the precise locations and routes will be addressed later at the site-specific level, dependent on such factors as the conditions and landscapes of adjacent ecosystems, integrated needs for protecting and managing resources within the ecosystem, and public health and safety (Prairie Plan 5-1).

Implementation of the Prairie Plan will be highly dependent upon a number of factors (Prairie Plan 5-1). Trail guidelines in the Prairie Plan (pp. 4-9) set criteria for locations and construction of trails based on the following considerations:

- a) Degree to which trails connect with adjacent public lands and trails.
- b) Provide trails of various lengths, looping when possible or connecting to a logical destination to provide choices and accommodate different skill levels and time commitments.

### **PC #: 119**

#### **Public Concern: The Midewin National Tallgrass Prairie should design facilities to be accessible for visitors with physical limitations.**

“Several paved trail loops that extend from the visitor parking lots that are stroller and wheelchair accessible would provide access for visitors who cannot or walk or hike. These trails should include adequate interpretive signage, and should provide a unique, exciting introduction to Midewin.” (Preservation/Conservation Organization, Chicago, IL - #57)

“Midewin should indeed be managed to provide for a variety of visitor experiences. Building an auto loop, however, is not the only way to ensure that all visitors can experience the delights of the prairie, nor should it be the preferred alternative. Shorter, paved trail loops can be strategically located next to parking lots to allow those unable to walk the chance to get up close and personal with the wildflowers of Midewin. In these locations, wheel chairs can be provided, trails should be handicap accessible, and scenic overlooks can provide a view of the vast prairie landscape for everyone to share. In addition, all visitors will be encouraged to learn more about the native landscape at Midewin’s Interpretive Center.” (Preservation/Conservation Organization, Joliet, IL - #58)

“Making facilities accessible to people with disabilities is mentioned several times in the Plan, but I would like to see a notation under Facilities and Transportation #2 (4-30 Plan) that recommends an accessible tram if one is used to transport people on an interior route. Care should be taken that the lift for such a tram accommodates very heavy chairs (those that hold ventilators, etc.).” (Individual, Joliet, IL - #54)

#### **Agency Response:**

A shuttle is included in the selected alternative, but a self-guided auto loop is not. Interpretive trail and shuttle planning will be further defined in the Master Interpretive Plan. Goals and objectives for interpretive and environmental education programs, including recommendations for story lines and presentation methods to guide effective program development will also be defined in the Master Interpretive Plan, currently under development.

Detailed planning for trails and the shuttle will be done at the project specific level. Project level planning will incorporate public input, information from the Prairie Plan, the Master Interpretive Plan, and additional data gathered before and during the project level analysis.

All programs and facilities at Midewin, including trail and shuttle system development, must meet federal laws related to accessibility, and the Prairie Plan includes a standard to comply with accessibility guidelines in the Americans with Disabilities Act (Prairie Plan 4-8).

**PC #: 120****Public Concern: The Midewin National Tallgrass Prairie should use existing roads and bridges as trails and crossings.**

“We support the transportation guideline that existing roads and bridges should be considered carefully for trail use and crossing potential before being decommissioned.” (Village of Elwood, Elwood, IL - #52)

**Agency Response:**

The Prairie Plan contains transportation guidelines, which provide for consideration of existing roads and bridges for use as bicycle or equestrian trails or other appropriate travel routes prior to being decommissioned (Prairie Plan 4-18). Trail guidelines set criteria for the location and construction of trails (Prairie Plan 4-9). Additionally, all decisions on the use of existing roads and bridges for recreational transportation will include the consideration of public health and safety, for instance the load capacity of bridges.

**PC #: 121****Public Concern: The Prairie Plan should include provisions for self-guided automobile tour loops within the Prairie.**

“Alternative 4, the preferred plan, is geared to one-time visitors, recreational users and the fit, hardy hikers. Add a self-guided auto route with interpretive stops and short trails so those unable to walk long distances and Senior Citizens who are prairie lovers can have access to more areas. Alternative 4 restricts this group to the Shuttle Route.” (Individual, Plainfield, IL - #44)

“A shuttle system is an acceptable mode of transportation to introduce first-time visitors to Midewin and for children who want an adventure ride. It is not a system that will be used for repeat visits by people who enjoy the prairie. Other reasons why a self-guided auto route might be useful include: 1. For early or late arrival if the shuttle isn’t in use. 2. For only 1 or 2 people. 3. In the winter if the shuttle is an open vehicle. 4. In the summer if the shuttle doesn’t have air conditioning. 5. Time constraints for chance visitors passing through on Interstate 55 or Route 53. 6. In the event of mechanical problems with the shuttle. 7. For those who prefer solitude and don’t want to share their prairie experience with a shuttle crowd. 8. And perhaps, after 10-40 years, the same people who now prefer the solitude of the prairie on their long treks will themselves be the elderly or less fit and confined to the restrictions of the shuttle.” (Individual, Plainfield, IL - #44)

**Please see Agency Response Below**

**PC #: 122****Public Concern: The Prairie Plan should not include provisions for self-guided automobile tour loops within the Prairie.**

“Perhaps the most important reason for not including an auto tour loop in the plan is to set a precedent of restricting the use of all motorized vehicles—on road and off-road—at Midewin except in parking lots and access points. Just as off-road vehicles, such as motorcycles and snowmobiles, should not be allowed at Midewin, neither should personal automobiles. Creating roads and trails to service any type of motorized vehicle can result in substantial impacts to the prairie ecosystem from active use by a growing population of visitors as well as potential abuse of the system by users who seek to establish their own roads/trails. There is no reason not to think that Midewin may some day be in jeopardy of being loved to death just like the more established national parks and wilderness areas, many of which are currently struggling to cut down and eliminate cars and off-road vehicles. It may be hard for some people to imagine hoards of cars and motorcycles lining up to travel through Midewin, but it is certainly not too far off. For one, the prairie is in close proximity to the huge metropolitan Chicago area, which is growing by leaps and bounds.” (Preservation/Conservation Organization, Joliet, IL - #58)



“We recommend against a self-guided auto tour loop. Personal vehicle use beyond the visitor parking lots should be restricted everywhere at Midewin. A self-guided auto tour loop is not compatible with the purposes of Midewin specifically listed in the 1995 Illinois Land Conservation Act. Motorized recreation conflicts with the conservation and enhancement of native flora and fauna—Midewin’s first purpose. In general, disturbances to wildlife and wildlife habitat caused by motor vehicle operation can be linked to the following negative results: stress and displacement of animals, nest or territory abandonment, nest and habitat destruction, interruption of breeding behavior, and road kill, especially amphibians and reptiles. Not only do roads result in direct loss of habitat for wildlife, the displacement effects of human induced disturbances minimizes the suitability of habitat adjacent to the road. For these reasons, the use of motorized vehicles at Midewin should be kept at a minimum. Some people will argue that much of the preserve will not be accessible unless roads are built to it. But the main value of Midewin is as a large natural habitat. People would like to drive or take the train to the edge of such habitat and experience it. If the entire site is dissected by a network of roads, then there will be no large natural habitat for people to journey to. We believe that people will support and appreciate a restoration of this continent’s only tallgrass wilderness anywhere in the cornbelt. We believe that in time even the interior areas will be well-visited by hikers, hunters and wilderness campers. It should be a major goal of Midewin to maintain as large as possible areas of unbroken nature.” (Preservation/Conservation Organization, No Address - #49)

“A plus of Alternative 4 is that neither public roads nor self-guided auto loops are planned. Instead, a more prairie friendly, interpretive transportation route and public transportation system is provided for. Similar proposals have been made for numerous overcrowded national parks nationwide and would put Midewin at the cutting-edge of such desirable development. Much thought should be put into this system in order to make it appealing to the general public. If done imaginatively, it could become another reason to visit Midewin.” (Individual, Tinley Park, IL - #25)

### **Agency Response to PC #121 and #122:**

The selected alternative includes a shuttle system, but has no self-guided auto route. Alternative 4 is preferred because it significantly reduces the habitat area affected by transportation and will be designed to best meet the needs of the majority of visitors to Midewin. One possible means of implementing a shuttle system would be to transport visitors to remote points of the prairie where they would be dropped off and picked up. Other visitors could ride the shuttle for a guided prairie tour. The issues raised in the comments above will be considered when we undertake project specific planning for the shuttle transportation system. A market analysis is currently underway at Midewin and, along with public input at the environmental assessment and subsequent stages of shuttle development, the analysis will provide information which is expected to be useful in designing Midewin’s transportation system.

### **PC #: 123**

#### **Public Concern: The Midewin National Tallgrass Prairie should remove as many roads as possible to alleviate wildlife fragmentation.**

“The Sierra Club supports removal of as many roads as possible from the interior of Midewin in order to eliminate the fragmentation caused by roads.” (Preservation/Conservation Organization, Chicago, IL - #28)

### **Agency Response:**

From the 115 miles of existing road the selected alternative provides for approximately 28 miles of administrative roads at Midewin. The Prairie Plan includes an objective under Facilities and Transportation to decommission roads not needed for administrative access or Prairie management or to provide access to Army in holdings and return the lands to desired resource management” (Prairie Plan 2-11). Additional roadbeds may be retained but reduced in scale for trail development.

**PC #: 171****Public Concern: The Midewin National Tallgrass Prairie should limit the number of public access points into the Prairie.**

“Having some familiarity with the site, I think eight public access points seems like too many. It may be wiser to select five of these as public access gates and reserve the other three for public health and safety, law enforcement, and research/monitoring uses. The more public gates the more staff that will have to be dedicated to manning them. It also increases the logistics for law enforcement issues. I support removing all internal paved roads that have no law enforcement, safety or evacuation benefits to the site. Other roads (gravel/dirt) should be as narrow as possible and can serve as fire breaks and access lanes to management units. These roads may have some recreational use but may have to be closed due to weather conditions, concentrations of nesting, migrating or wintering wildlife, etc.” (Illinois Natural History Survey, Champaign, IL – #67)

**Agency Response:**

The selected alternative provides for eight public access points; six with associated parking lots. With the exception of the seed production area parking areas and possibly the visitor center parking lot, these public parking lots and access points are on the periphery of Midewin National Tallgrass Prairie. The access to the administrative area will probably experience limited public use once the visitor center complex is completed. Closure of some parking areas and access points could be authorized by the Prairie Supervisor in order to protect Midewin's resources, should the need arise.

The only public access to the interior of Midewin will be for the shuttle system. This road will be developed for the shuttle or for administrative use. All other administrative roads will be maintained to meet the needs of Midewin. Travel on these roads will be restricted as necessary to protect wildlife and other resources (Prairie Plan 4-17).

**PC #: 124****Public Concern: The Midewin National Tallgrass Prairie should use electric powered trams for public access within the management area.**

“A properly designed tram tour would not be incompatible with the purposes of Midewin and could provide a safe, quiet, and effective way to see the Prairie. We recommend that the tram be electric, or powered by the cleanest kind of energy that would cause the least amount of disturbance. Furthermore, the tram should use existing service roads and not have roads built specifically for its use.” (Preservation/Conservation Organization, No Address - #49)

“While Openlands recognizes the need to provide access to those who cannot or would prefer not to walk at Midewin, this can be accomplished through a guided, electric tram tour. A tram would be a wonderful method for transporting visitors to trail locations throughout the prairie, and would provide informed access for those who might have trouble walking.” (Preservation/Conservation Organization, Chicago, IL - #57)

“Restricting the use of personal motorized vehicles does not prevent Midewin from serving its visitors' transportation needs in the future. If the demand for transportation within the site becomes great, an electric tram could be built to transport hikers and sightseers from one end of the prairie to another.” (Preservation/Conservation Organization, Joliet, IL - #58)

**PC #: 125**

**Public Concern: The Midewin National Tallgrass Prairie should consider using small, low impact electric cars in conjunction with the tram system for public access within the management area.**

“While we fully support implementation of a tram system at Midewin, does the concept of a tram system allow for visitors to access and travel the tram route in smaller, low impact, electric carts or ‘prairie bugs’ that could be rented on an hourly or daily basis. The logistics of managing a fleet of ‘prairie bugs’ would likely be similar to the logistics of managing a tram system. ‘Prairie bugs’ would allow visitors more flexibility, might reduce the need for tram drivers, and might be more cost effective. Visitors would likely be willing to pay \$20 for a ‘bug,’ but likely would not be willing to pay more than a few dollars to ride the tram.” (Individual, Wilmington, IL - #27)

**Agency Response to PC #124 and PC#125:**

Although selected alternative includes a proposed shuttle route, a site-specific environmental assessment will be completed prior to project implementation to best determine all variables involved with the design and operation of the shuttle. Possible variables may also include the vehicle type and size, operating hours, cost analysis, and projected use. The Master Interpretive Plan and Market Analysis being completed concurrent to the final Prairie Plan will provide additional guidance for the shuttle development.

**PC #: 126**

**Public Concern: The Prairie Plan should ban snowmobiles from the management area.**

“Ban snowmobiles.” (Individual, No Address - #12)

**Agency Response:**

The selected alternative prohibits motorized use of trails at Midewin. The Prairie Plan provides for non-motorized recreation opportunities (Prairie Plan 2-9). The Prairie Plan Standards and Guidelines for Transportation allow for limiting or restricting travel to provide for public safety and protect species and habitat (Prairie Plan 4-17). The Prairie Supervisor also has the authority to issue closure orders as necessary to ensure compliance with the Prairie Plan. Motorized access is allowed on public access points and parking lots.

**PC #: 127**

**Public Concern: The Midewin National Tallgrass Prairie should provide short hiking trails at all public access points.**

“All seven public access points should have short hiking trails so visitors can sample many parts of the Midewin National Tallgrass Prairie.” (Individual, Joliet, IL - #17)

**Agency Response:**

A variety of hiking opportunities will be available at Midewin, including short interpretive hiking trails near trailheads. Most trailheads will access a loop trail less than one mile in length (see Prairie Plan figure 6). Part of the desired condition for Midewin is to provide trail opportunities unencumbered by vehicle traffic, as well as opportunities for both short, easy hikes and more challenging trips by foot, bicycle, or horseback (Prairie Plan 2-9). Recreation trail guidelines state that Midewin should “Plan for and develop trails for a variety of challenge levels, appropriate to the Recreation Opportunity Spectrum setting,” (Prairie Plan 4-10).

**PC #: 128****Public Concern: The Midewin National Tallgrass Prairie should provide safe bicycle access to the main administrative site.**

"I'm particularly concerned by the lack of bicycle access to the main administrative site which lies along a really horrible and unbikeable stretch of highway 53 (55 mph. Two lane divided highway with no shoulder). There is a trail from Joliet planned for access to the east end of Midewin, (Wauponsee trail?) but it is remote from the current visitor's center with no internal trail." (Individual, Chicago, IL - #42)

**Agency Response:**

As the future visitor center will be the focus of public visitation rather than the Forest Service administrative site, there are no plans to connect the administrative site to the rest of Midewin by means of a trail. For future access to the visitor center, however, the nearby communities of Wilmington and Elwood may work together with the State Highway Department of Transportation to plan for safe bicycle access along Illinois Route 53 between Joliet and Wilmington. A bicycle route along the highway would pass near the planned visitor center.

**PC #: 129****Public Concern: The Midewin National Tallgrass Prairie should cooperate with Will County to develop recreational trails on the east side of the management area.**

"I think it would be fair to say that horsemen in general picture connections from the Wauponsee Trail into the Midewin to be developed in a very consistent time framework. In other words, the horsemen's concept of riding the Wauponsee involves access to the Midewin, as well. The planning tour seemed to indicate that Midewin staff priorities are running, however, in a west to east course that focuses first on Route 53. I would like to urge cooperation between the county and Forest Service to implement complementary trails and access on the east side of Midewin in a similar time frame." (Individual, Frankfort, IL - #51)

**Agency Response:**

We understand people's desire to walk, hike, or ride horseback on new trails at Midewin, an area that has been closed to public use for many decades. However, the crucial cleanup of environmental hazards, other safety concerns, and initiating prairie restoration will take time and involve considerable expense, priorities that must be addressed first. The most likely locations of the first trails will be those areas outside of the existing security fence or farthest from potential safety hazards. For these reasons trails are initially proposed on the west side of Highway 53.

Trail guidelines in the Prairie Plan (pp.4-9) set criteria for location and construction of trails including the following considerations:

- Degree to which trails connect with adjacent public lands and trails.
- Provide trails of various lengths, looping when possible or connecting to a logical destination to provide choices and accommodate different skill levels and time commitments.

**PC #: 130****Public Concern: The Midewin National Tallgrass Prairie should not select Alternative 6 because of its limited trail system.**

"I strongly object to Alternative six because of the extremely limited trail system." (Individual, Riverdale, IL - #16)

**Agency Response:**

After a detailed evaluation of all six alternatives as potential approaches for managing Midewin National Tallgrass Prairie, the Forest Service has selected Alternative 4 as Midewin's Land and Resource Management Plan. The Forest Service believes that Alternative 4 is the best approach to provide for both sensitive species habitat needs and recreational demands. Alternative 6 was not selected because it would not provide enough habitat to meet the long-term needs of short grass bird species and recreation users seeking more variety and opportunities for outdoor recreation.

**PC #: 131****Public Concern: The Midewin National Tallgrass Prairie should address potential conflicts between recreational trail users.**

"I perceive some 'imbalance' and have a strong complaint regarding a characterization of equestrians use. To address the 'imbalance' issue, the DEIS recognizes that trail user conflict would be less likely to occur under alternative 3, since it provides for more single use trails with more access points. I agree. Therefore, from a recreational standpoint it is unclear why an option with a higher conflict potential is favored." (Individual, Channahon, IL - #60)

"As an alternative to the proposed conventional multi-use trail, would consideration be given to developing an experimental trail of medium-width for hiking and biking that would be developed immediately parallel to a narrower equestrian trail? Hikers and bikers might gladly sacrifice trail width rather than having to contend with horse droppings. In addition, the horse trail could be strategically placed on the prevailing down-wind side of the hiking/biking trail to minimize the effects of odor. User conflict would be minimized and visitor safety and enjoyment enhanced. If multi-use trails are developed as loop trails, has consideration been given to having equestrian trail traffic move in the opposite direction of hikers and bikers? Safety and visibility for all would be improved, 'surprise' approaches minimized, and trail contact time between equestrians and hikers & bikers would be minimized." (Individual, Wilmington, IL - #27)

**Agency Response:**

Potential for conflict among users is one of the many issues by which to compare the alternatives. While Alternative 3 may minimize potential user conflict the most due to the greatest separation of user types, Alternative 4 does offer some separation of user types. Alternative 4 is the Selected Alternative based on its balance of environmental factors when combined with recreational use.

The Forest Service's management of Midewin National Tallgrass Prairie and other National Forests occurs at two levels. At the first level, the Forest Service develops the Land and Resource Management Plan (Prairie Plan), a broad, programmatic document accompanied by an Environmental Impact Statement. A public review process is also conducted in compliance with the National Environmental Policy Act. The Prairie Plan provides a broad framework and overall management direction. At the second level, the Forest Service implements the Land and Resource Management Plan by approving (with or without modification) or disapproving particular "site-specific" projects. Each project proposal is also subject to public involvement and review under the National Environmental Policy Act, and proposed projects must be consistent with the Prairie Plan.

The development of trails, their location, width, surfacing, and direction of travel will be addressed and reviewed at this second level of planning. Trail rules and etiquette will need to be established and trail users educated to help minimize user conflicts. Trails will be monitored for their impacts as well as their ability to serve user needs. The Prairie Plan Monitoring section addresses the monitoring needs for recreation (Prairie Plan pp. 6-9 and 6-10).

**PC #: 132****Public Concern: The Midewin National Tallgrass Prairie should restrict the playing of loud music within the management area.**

“It is anticipated that trails will be developed in a manner that will showcase the natural sounds and smells of the prairie. We recommend the development of policies that will restrict or control playing of loud music. Such noises would certainly diminish the experience of trail users.” (Preservation/Conservation Organization, No Address - #49)

**Agency Response:**

At this stage the focus of the Prairie Plan is on programmatic planning rather than on specific policies such as noise control. Policies that apply to noise control will be handled as administrative rules or orders issued by the Prairie Supervisor as the need arises.

In the Prairie Plan the Desired Condition for Recreation states, “visitors will be looking for experiences of solitude found in a naturally appearing setting not found elsewhere in this vicinity” (Prairie Plan 2-8). Once trails are opened for public use, trail rules and etiquette will be established, and trail users educated to help minimize user conflicts.

**PC #: 133****Public Concern: The Midewin National Tallgrass Prairie should widen multiple use trails to separate horses from other users.**

“Multi-use trails should be slightly wider to separate equestrian use from bikers and hikers.” (Individual, Joliet, IL - #54)

**Agency Response:**

Multi-use trails will be 10-14 feet in width, which is wider than other trail types (FEIS pp. 3-222). The appropriate width of a proposed trail will be addressed as specific trails are proposed for development. We encourage continued public involvement in the planning of specific trail projects at Midewin. Site-specific actions to implement the Prairie Plan include trail development, and these kinds of actions are best addressed at the project planning level in conjunction with public involvement and in compliance with the National Environmental Policy Act.

**PC #: 134****Public Concern: The Prairie Plan should not provide special facilities for equestrian trail users.**

“Personally, with the local opportunities, I do not see a need to have at Midewin much access for horses beyond trails. I would suggest that trails are manageable but that as a compromise to the restoration goals, access to horses via corrals, large parking facilities and even providing food/hay, should be really restricted. It would be much easier to manage horses and horse trails, the less actual time that a horse spends on the property.” (Individual, Evergreen Park, IL - #41)

**Agency Response:**

Equestrian use is identified as a type of trail use in the Final Environmental Impact Statement under Alternatives 3-6. The appropriate amenities needed to serve user needs will be determined at the site-specific or second level of project planning.

**PC #: 135****Public Concern: The Midewin National Tallgrass Prairie should develop mowed turf or dirt trails for equestrian use.**

“If you put in equestrian trails, I would like to suggest that you consider either mowed turf or dirt. Even though that may restrict our riding during particularly wet, rainy periods, it does provide better footing for horses.” (Recreational Organization, Harrisburg, IL - #37)

“Equestrians can make good use of screened gravel paths (but totally object to black top, which in our opinion has been a disaster in Pilcher Park). For multi-purpose use, mowed trails are generally satisfactory, and very cost effective. They are the preferred surface for our particular use. As everyone knows, mowed trails have a significantly lower installation cost than screened limestone. Therefore, with some judicious planning, a combination of limestone and mowed grass will optimize multiple use of the trails for most user categories.” (Recreational Organization, Naperville, IL - #56)

“If the choice of alternative 4 is based on a fragmentation premise, I agree with the DEIS that it is merely an assumption [emphasis added] that trail activity other than hiking would cause fragmentation (DEIS, p.3-221, 3-222). What makes this even more difficult to understand is the expectation that ‘more hikers than bicyclists or equestrians’ are expected and, that ‘hikers may go off designated trails in some areas’ (DEIS, p. 3-221). Perhaps the author of this statement in the DEIS has never had the experience of horseback riding with undomesticated playful fawns tagging along. Trail riding gives people the unparalleled ability to get very close to wildlife. The animals do not recognize ‘humans’ as ‘humans’ while mounted on a horse. As an example, this past weekend while trail riding, a companion noticed a coyote in the brush less than four feet from the side of my horse. A person on foot would have never been able to be that close. In terms of wild animals, equestrian use of trails seems to have little if any effect. From this perspective, the fragmentation issue simply does not exist. If however, concern still exists about fragmentation, I suggest that the ‘equestrian only’ trails be mowed turf or simply bare earth. This works exceedingly well in many area State Parks or riding areas. If the planned limestone screenings were to be eliminated from equestrian trails, even less ‘fragmenting’ would occur.” (Individual, Channahon, IL - #60)

**Agency Response:**

The use of turf or dirt trails for equestrian or bicycle use is a concern at Midewin. Although a turf trail can support an occasional horse or bicycle, under heavier use, there will be damage to vegetation and soils. Damage is likely to include trampling of desirable vegetation, exposure and compaction of soils, widening of trails as users circumvent mud, eroded sites, and standing water, and increased pollution and turbidity downstream from runoff (Liddle 1975; Weaver and Dale 1978; Wilson and Seney 1994). Additionally, invasive plant species will have opportunities for establishment in the disturbed areas (Benninger-Traux 1992). Turf trails have not been found to serve multiple use activities as well as trails with hardened surfaces.

The expert panel of scientists who analyzed the viability of sensitive species under the different alternatives agreed with the assumptions that equestrian and bicycle trails can become fragmenting features by the combination of such factors as width, surface material, and use (FEIS 3-221). Based on the expert panel’s conclusions, we determined that extra precautions are needed to protect sensitive species where trails are located. Therefore, we have proposed multiple use trails surfaced with limestone screenings, to create a stable travel surface that will also be relatively inhospitable to seedlings of invasive plant species. Multiple use trails will be located around the perimeters of large habitat areas to minimize fragmentation of grassland habitat.

Although equestrians may see more wildlife than other user types, there are many species for which the impacts of equestrian and high bicycle use remain unknown. Neither deer or coyotes are representative of the response of other wildlife species, which vary widely in their sensitivity to disturbance (Miller et al. 1999, 2001); ecological integrity requires the presence of a few, tolerant or charismatic species. A narrow, mowed hiking trail is not considered fragmenting owing to its grass surface, narrowness, and limited use. Also, nesting birds habituated to trail use may be

disturbed when off-trail use occurs (Miller 2001), thus reinforcing our decision to restrict high-impact activities to trails and to close trails as necessary (Prairie Plan 4-8).

**PC #: 136****Public Concern: The Midewin National Tallgrass Prairie should clarify the difference between “Equestrian Trails” and “Equestrian Use” in the Final EIS.**

“Page 2-12 of the DEIS lists both Equestrian Trails and Equestrian Use, What is the difference?”  
(Preservation/Conservation Organization, Joliet, IL - #58)

**Agency Response:**

Equestrian trails are the physical transportation features on the land, whereas equestrian use is the movement of horses and people across the land. In some cases, the trail itself causes impacts, for example, acts as a barrier to the migration of amphibians. In other cases, the animal and rider (equestrian use) may cause impacts in the form of seed dispersal, off-trail riding, disturbance to sensitive species, or erosion.

**PC #: 137****Public Concern: The Prairie Plan should provide long pull-through day use parking facilities for equestrian trail users.**

“I would like to suggest that parking lots for day use riding be fashioned after the parking lot at Waterfall Glen Forest Preserve in DuPage County Illinois. They have approx. 15 pull through parking spaces that are long enough for a truck pulling a large trailer. Many horsemen have longer trailers these days as horse camping has become very popular.” (Individual, No Address - #8)

**Agency Response:**

We encourage continued public involvement and participation in planning at the site-specific level at Midewin. Site-specific actions to implement the Prairie Plan include trail development projects. Such actions will be addressed at the second planning level in conjunction with public involvement and in compliance with the National Environmental Policy Act. The appropriate amenities needed to serve user needs, including those of equestrian users, will be determined at this second level of planning. At that time, the purpose and need of particular projects and alternatives to addressing specific issues associated with those projects will be considered.

**PC #: 138****Public Concern: The Prairie Plan should require special-use permits and daily limits for commercial horse operations to control recreational access and minimize environmental damage.**

“The Sierra Club also suggests that the Forest Service establish a strict policy requiring special use permits and per-day limits on visitors coming into Midewin from commercial horse camps or other kinds of commercial activities located off-site. For example, Sierra Club activities and the USFS have both had negative experiences with commercial horse camp developers in the Shawnee National Forest, who build camps adjacent to public land where owners can stay and stable their horses. Commercial horse camp owners attract a large number of equestrian visitors who come to ride on neighboring public land and often create a great deal of trail and soil damage on their single access routes on and off public land. Through the use of permits, the number of users can be controlled; and through proper trail construction, access to and



from Midewin can take place without damage to trails or surrounding habitat.” (Preservation/Conservation Organization, Chicago, IL - #28)

**Agency Response:**

Currently there are no nearby private equestrian facilities, and no equestrian trails or parking facilities are open to the public at Midewin. The capacity of future equestrian trails will be limited initially by requiring user permits on a fee basis and by limiting the number of parking facilities. User capacity will be monitored, and other means to limit use may need to be developed if warranted to protect resources at Midewin.

The Forest Service considers special use permits on a case-by-case basis. If a proposal (such as an equestrian use facility) involves ground disturbance, the proposed action must be analyzed in compliance with the Prairie Plan and with the National Environmental Policy Act, and it must include opportunities for public involvement in the project planning process.

**PC #: 139****Public Concern: The Midewin National Tallgrass Prairie should construct equestrian camping facilities in the management area.**

“We camp with our horses about 20 weeks per year and would like to see an equestrian campground in the plan. The recently opened Jim Edgar Panther Creek State Fish and Wildlife Area in Illinois would be an outstanding model of a horse campground. Everything was made to last in the camp and trail construction was top notch. We definitely need more opportunities to camp with horses in northern Illinois.” (Individual, No Address - #8)

“We would like to request an equestrian campground also. There are very few in the northeastern IL. Camping near the bunkers, & planting trees could screen the view.” (Individual, Stoneport, IL - #22)

“I also would like to see provision for horse camping, perhaps done in cooperation with the county. Travel with horses to trail ride is very common, and camping is a great economic generator for an area with campsites available and interesting trails.” (Individual, Frankfort, IL - #51)

**Agency Response:**

Equestrian camping is not proposed in any of the alternatives, as the length of trails proposed are more suitable for a day trip experience. Equestrian camping is available at nearby Kankakee River State Park and is also being considered by the Forest Preserve District of Will County along the Wauponsee Glacial Trail.

**PC #: 140****Public Concern: The Prairie Plan should strictly limit campground and picnic area development to facilities and activities that promote the Prairie’s conservation and education objectives.**

“If a developed campground is to be constructed at Midewin, the campground should be developed, not for purpose of filling a need for additional RV camping in the greater Will County Area, but for Midewin visitors. It should be designed, sized, and located so as to promote the prairie. Such a campground should be operated in a manner that would restrict detractions such as overt lighting, sound systems, generators and uncontrolled pets. Whether or not a developed campground is constructed, a picnic area should be provided as an amenity that will likely be used by many Midewin visitors. The picnic area should be managed so as not to become the domain of any one particular user group. Properly developed, a picnic area could serve as an educational tool to showcase and promote the prairie.” (Individual, Wilmington, IL - #27)

**Agency Response:**

As stated in the Land and Resource Management Plan, the unique recreational experiences that can be provided at Midewin include solitude and vastness to the extent possible, in a naturally-appearing setting not found in the nearby vicinity. Midewin will strive to provide recreational opportunities that enhance the visitor's appreciation and understanding of prairie restoration (Prairie Plan 2-8). Alternative 4, the Selected Alternative, proposes a group campground and a picnic area.

At this first level of planning, the Forest Service develops the Land and Resource Management Plan, a broad, programmatic document and overall management direction. At the second level, the Forest Service implements the Land and Resource Management Plan by approving (with or without modification) or disapproving particular "site-specific" projects such as picnic areas and campgrounds. Each project proposal is subject to further public involvement and review under the National Environmental Policy Act, and the proposed projects must be consistent with the Land and Resource Management Plan. Details on the level of development and services offered are developed and analyzed during the second level of project planning.

**PC #: 141****Public Concern: The Midewin National Tallgrass Prairie should design picnic areas to serve the needs of all recreational users.**

"It is suggested that any developed picnic area(s) be designed to serve the needs of trail users as well as the needs of other visitors such as campers." (Individual, Wilmington, IL - #27)

**Agency Response:**

In Alternative 4, the Selected Alternative, the picnic area and group camping area will be connected by a hiking and bicycle trail. The picnic area may be divided into different group areas. Trails may provide periodic rest stops suitable for a few individuals to picnic along the trail corridor (Prairie Plan pp. 4-10). Details will be determined during the second, or site-specific level of planning.

**PC #: 142****Public Concern: The Prairie Plan should provide dispersed and group camping facilities to enhance visitors' experience of the Prairie.**

"Facilities for dispersed and group camping should be provided so as to allow visitors an opportunity to experience the prairie on a more intimate level." (Individual, Wilmington, IL - #27)

"The concept of dispersed camp sites in Management Area 1 is another plus of Alternative 4. The dispersed sites would generally be low cost and be in the spirit of the 'prairie experience'. These dispersed sites should offer some shade to the user by being designed to include the trees of the savanna." (Individual, Tinley Park, IL - #25)

**Agency Response:**

Dispersed and group camping opportunities are proposed in Alternative 4, the Selected Alternative. The quantity, location, and amenities will be determined at the site-specific, or second level of project planning.

**PC #: 143****Public Concern: The Midewin National Tallgrass Prairie should coordinate efforts with Will County to develop complimentary camping facilities.**

“The District also plans to provide limited camping at the north and south access areas (Laraway Road and Ballou Road, respectively) of the WGT [Wauponsee Glacial Trail]. We anticipate close coordination between our two agencies in designing complimentary programs to meet the camping need of the public and various trail users.” (Forest Preservation District of Will County, Joliet, IL - #18)

**Agency Response:**

The Forest Service at Midewin will continue to seek input from interested individuals and groups and continue to work in coordination with adjacent public land managers, including the Forest Preserve District of Will County and Illinois Department of Natural Resources, to offer complimentary outdoor recreational programs and experiences.

**PC #: 144****Public Concern: The Midewin National Tallgrass Prairie should consider developing ROS class camping facilities west of Route 53.**

“The Village supports consideration of some ‘rural’ recreational ROS class camping on the west side of Route 53.” (Village of Elwood, Elwood, IL - #52)

**Agency Response:**

There are a number of factors we considered when classifying different areas according to the Forest Service Recreation Opportunity Spectrum. For Midewin, the “rural” classification was used to describe the setting of future highly developed sites such as the campground and visitor center. Different factors were considered, including sensitive species, noise, quality experience, safety, and traffic volume. That portion of Midewin located west of Illinois Route 53 contains the greatest area of native vegetation, including the rare dolomite prairie. There is a critical need to minimize activities that may impact those sensitive areas. Additionally, several factors external to Midewin were considered as they could affect the quality of someone’s camping experience west of Illinois Route 53, including noise disruptions from an active railroad, Deer Run Industrial Park, and Interstate 55.

**PC #: 145****Public Concern: The Midewin National Tallgrass Prairie should postpone construction of developed campgrounds in order to conduct a needs assessment.**

“To further preserve the natural experience of the prairie at Midewin, the Sierra Club recommends that construction of developed campgrounds be postponed during this 10-year planning period. In the meantime, the Forest Service can rely on free enterprise outside the park to provide developed campgrounds for RVs, campers and other hard-sided vehicles. We recommended that staff evaluate the demand for more developed campgrounds for the next land management plan by gauging the success of private developed campgrounds off-site.” (Preservation/Conservation Organization, Chicago, IL - #28)

**REDIRECT FUNDS TO OTHER MANAGEMENT PROJECTS**

“Construction of a developed campground should be deferred until the next planning session (10 to 15 years from now). Resources and capital required to develop a formal campground could better be used for prairie restoration, education, interpretive materials, etc. In addition, it might be premature to determine the demand for a developed campground. There is an increasing likelihood that private campgrounds will be developed nearby in response to the many area attractions.” (Individual, Wilmington, IL - #27)

**Agency Response:**

Management activities projected to occur in the next five years are identified in Appendix F of the Prairie Plan. A campground is not specifically identified during that time, as the emphasis will be primarily on restoration activities, habitat management, Army clean up operations, and trail development. Future site-specific planning will efforts will examine the need for campground development considering the types and capacities of both existing and proposed campgrounds in the surrounding area.

**PC #: 146****Public Concern: The Prairie Plan should restrict alcohol use within the Prairie.**

“Chapter 1-13 of the Management Plan states under principle #4 that any legal public activity is allowed unless specifically restricted. Would alcoholic beverages be allowed in the campground (or at Midewin)? It is suggested that alcohol be restricted or be allowed only by special permit.” (Individual, Wilmington, IL - #27)

**Agency Response:**

As the Prairie Plan is programmatic, it is not intended to address specific public uses and activities at Midewin. Policies on future public activities that will be allowed will be developed to be adaptable and responsive to different issues relating to recreational use. The Prairie Supervisor may restrict some activities or require permits for others as the need arises or as determined necessary from monitoring recreation use effects at Midewin.

**PC #: 147****Public Concern: The Midewin National Tallgrass Prairie should manage hunting activities to be compatible with other recreational opportunities.**

“Allowed hunting is not opposed, but any allowed hunting should be managed and limited so as to be compatible with other recreational activities such as hiking, biking, horseback riding, and wildlife viewing. Consider that many visitors will come to Midewin to view a variety of wildlife in a natural setting. Visitors from urban and suburban areas will likely be as excited seeing a coyote or pheasant as an endangered upland sandpiper or a rare Blandings turtle. . . . It is anticipated that hunting for recreation and management purposes will be controlled by the USFS and will be by permit only. Large scale hunting, due to safety concerns, restricted usage areas, and noise would certainly impact and limit the ability of many visitors to enjoy Midewin. Will the wildlife management plan address potential users conflicts that may occur if recreational hunting is allowed at Midewin? Limiting the species hunted to deer, waterfowl, and pheasant would be one means of minimizing user conflicts. Recreational hunting for lesser hunted species such as dove, squirrel, crow, groundhog and turkey should be restricted.” (Individual, Wilmington, IL - #27)

“To insure the safety of other visitors perhaps restrict hunting 1) to bow (not compound or cross-bow) and arrow or 2) within a restricted area.” (Individual, Riverdale, IL - #16)

“Safety dictates that hunting not be allowed in the immediate vicinity of trails and trail users. Also, consider that family groups using trails may be uncomfortable around hunters and the sound of gunfire. It is anticipated that many of the designated hiking, and equestrian trails will remain open during any allowed hunting season. It is suggested that the issue of ‘user conflict’ between trail users and hunters be addressed early on and that a compromise usage plan be developed that will be acceptable to all.” (Individual, Wilmington, IL - #27)

**SPECIFY MEASURES TO ENSURE VISITOR SAFETY**

“Hunting has been an ongoing practice at MNTP and is proposed to continue. We believe hunting will be an important management tool for maintaining deer density below the threshold of species or habitat impacts. The District has concerns about potential conflicts between hunting and site visitors. The plan does not elaborate if MNTP would be closed during shotgun season, or what other actions would be taken to insure visitor safety, as well as the safety of users on adjacent public land, specifically WGT. The District wishes to coordinate with MNTP as these details are being worked out.” (Forest Preservation District of Will County, Joliet, IL - #18)

**Please see Response to PC#151 below.**

**PC #: 151**

**Public Concern: The Prairie Plan should clearly identify specific hunting areas.**

“On 4-30 of the Plan under Recreation and Interpretation - Standards, ‘Prohibit hunting in developed recreation areas.’ Where are these areas? Are they the developed sites on the Management Areas Map - Figure 2? Are hiking trails, shuttle routes, etc. considered developed recreation areas? What parts of the Prairie would be ‘shut down’ during various hunting seasons?” (Preservation/Conservation Organization, Joliet, IL - #47)

**Agency Response to PC #147 and #151:**

Public safety is our primary concern at Midewin, and we recognize the potential for visitor use conflicts between hunters and other outdoor recreation users. Recreational Goal 1 in the Prairie Plan (pp.2-8) states: “Plan and manage the recreational program...to provide for safety and security.” A recreation standard for Management Area 2 prohibits hunting in developed recreation areas (Prairie Plan 4-33). Management Area 2 includes all the administrative and developed recreation sites at Midewin, including the seedbeds, visitor center, picnic area and campground. Hiking trails and shuttle routes are not considered to be part of Management Area 2. A map of the Management Areas is included in the Prairie Plan (Figure 2).

The visitor center, which includes a zone of land around visitor center facilities, will include a short interpretive trail that will be restricted from hunting at all times. Forest Service Regulations also specify rules for hunting near recreation facilities or developed areas, (36 C.F.R. §261.10[d]) and management at Midewin follows applicable Forest Service Regulations. The hunting program is managed in accordance with state and federal rules and regulations.

Areas open to hunting at Midewin are clearly identified. All hunters must possess a valid state hunting license and purchase a permit to hunt at Midewin. The hunting program is re-designed and evaluated each year to adjust to the needs of hunters, wildlife, and recreational activities. Hunting is considered both a recreational activity and a tool for species management at Midewin. The Prairie Supervisor may at his/her discretion, institute additional user regulations or area closures for specific activities, as needed, to ensure public safety and protect resources.

Our current hunting program provides for archery starting in October through January, with 9 days of use provided for hunters with firearms in November. All hunting is restricted to designated zones that may change from year to year depending on wildlife issues and other activities within Midewin.

**PC #: 148****Public Concern: The Prairie Plan should allow hunting for wildlife management purposes.**

“Hunting for management purposes is supported. Uncontrolled populations of deer, raccoon, skunk, etc. can cause significant damage to the prairie and prairie restoration efforts.” (Individual, Wilmington, IL - #27)

**Agency Response:**

As the hunting program is to be guided by the Prairie Plan, which includes standards and guidelines for Wildlife Management Game Species, diligent monitoring of some wildlife game species and habitat conditions will help us determine appropriate species, zones, and limits for the hunting program in a given year (Prairie Plan 4-30). We will coordinate with the Illinois Department of Natural Resources on Midewin’s hunting program to implement game species management in conjunction with sound ecosystem management practices.

**PC #: 149****Public Concern: The Midewin National Tallgrass Prairie should recognize the economic benefits of allowing opportunities for hunting.**

“I realize everybody has different ideas on how this land should be allocated and used which varies with their recreational interests. My own feeling on this is that along with limited development and preserves I hope that the hunters are not left out. Hunters contribute billions of dollars to State and Federal funds through taxes and licenses not to leave out Conservation Organizations such as DU, NWTF, FF, etc. . . . Of all these monies generated very little has been done which provides Northeast Illinois hunters more opportunities for hunting. I feel the MNTP would accomplish this and hope that the people whose dollars support recreational lands such as this one are not locked out of it.” (Individual, Willow Springs, IL - #20)

**Agency Response:**

Midewin continues to be accessible to deer hunters. Over 600 licensed hunters enjoy deer hunting from October through January each year. Although hunting is included in all alternatives to the Land and Resource Management Plan, it is not a land allocation issue, as no specific area is set aside for hunting alone. Therefore hunting does not appear on the planning maps for Midewin. However, hunting is considered an outdoor recreational activity as well as a wildlife management tool, and designated hunting areas within Midewin may change based on wildlife management goals and other site activities (Prairie Plan 4-30). Additional types of hunting such as turkey hunting may be made available as conditions permit.

We recognize the economic benefits from some outdoor recreational opportunities proposed at Midewin and we recognize as well that many private organizations support habitat restoration projects. The Forest Service looks forward to working cooperatively with organizations and individuals interested in habitat conservation and public recreational opportunities at Midewin.

**PC #: 150****Public Concern: The Midewin National Tallgrass Prairie should not introduce species for hunting or fishing purposes.**

“The Plan should reflect the Illinois Land Conservation Act which emphasizes the enhancement and conservation of native species. While pressure for access to the Prairie by hunters may be great, their role should be one of managing overpopulation of specific species. The introduction of non-native species for

hunting or fishing purposes does not fit the overall vision for the Prairie.” (Preservation/Conservation Organization, Joliet, IL - #47)

“I am totally against the introduction of species for hunting purposes and feel it does not have a place at the Midewin. I also feel that the public should not be excluded during a good part of Fall to allow hunting over vast areas. This is a time of year when weather is cool, ticks and mosquitoes are on the wane and hiking at the Midewin could be exhilarating. Besides which, hunting is allowed in the Des Plaines Conservation Area and Joliet Army Training Area. Hunting to control overpopulation of deer is understandable.” (Individual, Joliet, IL - #54)

“While we are not opposed to ‘put-and-take’ hunting on nearby Illinois State owned properties, we are opposed to ‘put-and-take’ hunting at Midewin. Midewin should be managed in a natural manner. Turning loose great numbers of pheasants, turkeys, and red fox for the sole purpose of shooting them is certainly inconsistent with the purpose of Midewin.” (Individual, Wilmington, IL - #27)

### **Agency Response:**

The first purpose of Midewin as directed by the establishing legislation is: “To manage the land and water resources to conserve and enhance native wildlife, fish and plant populations and habitat.” In efforts to address this purpose, hunting is considered not only a recreational activity, but a tool for wildlife management as well, and is therefore, focused on undesirable or overabundant species. In response to public comments and to clarify Midewin’s policy on species introduction, an additional guideline has been added to the Prairie Plan to restrict introduction of non-native wildlife (Prairie Plan (4-30)).

### **PC #: 152**

#### **Public Concern: The Midewin National Tallgrass Prairie should take action to prevent over-hunting of species.**

“Extreme care should be taken to ensure that hunted species are not over-hunted.” (Individual, Wilmington, IL - #27)

### **Agency Response:**

The hunting program at Midewin is managed in close cooperation with the Illinois Department of Natural Resources. In order to prevent over-hunting, monitoring will be conducted on a regular basis to allow for adaptive management. The hunting program may be adjusted yearly to accommodate changes in species populations.

### **PC #: 153**

#### **Public Concern: The Prairie Plan should establish policies that restrict pets within the Prairie management areas.**

“Alternative 4 makes no mention of pet control even though Appendix A of the DEIS references the damaging effects that pets can have to different bird species. Pets are a nuisance to natural areas. Pets disturb wildlife and soil trails for other users. Pets should be banned from Midewin. This ban should be made part of the Prairie Plan, and this ban should be actively enforced.” (Individual, Tinley Park, IL - #25)

“There needs to be a definitive statement about pets - bringing pets, like dogs, onto the grounds, on trails, to the Visitor Center, where ever. What is the current MNTP policy, what is the FS policy, is there room to create a policy. If there is room to define policy, I would suggest that, due to the sensitive nature of restoration efforts, dogs are prohibited from all areas in Management Area 1 - this includes all restoration areas, grassland habitat, trails, etc. Perhaps if people are traveling through with their pets, then there could be a designated dog walk area at the Visitor Center. But you don’t want dogs out on the prairie, they can poop invasive stuff or unhealthy stuff, people do not pick up after them if they don’t have to, they could

damage sensitive flora and fauna, etc. Just like not having dog trailing here, not dogs on the prairie either.” (Individual, Evergreen Park, IL - #41)

“Has the issue of hunting dogs and their impact on Midewin wildlife and visitors been addressed? While the Sierra Club is not opposed to controlled and limited hunting at Midewin, we are concerned that dogs used for hunting may cause harm and disruption to non-game wildlife, especially in the spring and fall when hunting season coincides with bird migration and the setting up of nesting territories. In addition, please consider that hunting dogs could cause significant problems for wintering owls and raptors, even during the fall and winter months. The Draft EIS discusses in detail the ways in which habitat enhancement at Midewin may benefit Northern Harriers and Short-eared Owls. Both species may nest in increasing numbers at Midewin and it is likely that additional numbers will winter there, along with other raptors. Since Short-eared Owls roost on the ground during the day, they are very susceptible to disturbance by dogs, as they roost on the ground during the day. Experience at Pratt’s Wayne Woods in DuPage County has shown that off-leash dogs very frequently flush Short-eared Owls. It is a contradiction to manage habitat to suit breeding Short-eared Owls and Northern Harriers, only to permit activities that will negatively impact their wintering success. It is strongly suggested that hunting and sporting dogs be banned at Midewin for the reasons provided and for the reasons identified on page 3-199 of the DEIS concerning vectors and the spread of invasives.” (Preservation/Conservation Organization, Chicago, IL - #28)

#### **IDENTIFY PET CARE FACILITIES**

“To accommodate those people traveling with pets, facilities should be available to board pets. These facilities could be a kenneling facility maintained on site or available through a simple understanding with local residents or veterinarians. The availability of these facilities should be conspicuous at all access points. Also conspicuous should be the signage banning pets.” (Individual, Tinley Park, IL - #25)

#### **PROHIBIT DOG TRIALING**

“While provided in the Draft Environmental Impact Statement (ref: page 1-13) that dog trialing is ‘Not Addressed in the DEIS’ for reason that it is considered a ‘special use’ as identified in the Analysis of the Management Situation - July 1999 (ref: page 3), it is suggested that dog trialing not be permitted at Midewin.” (Preservation/Conservation Organization, Chicago, IL - #28)

#### **Agency Response:**

Additional recreation guidelines have been developed to address the concerns about pets and dogs. Prairie Plan guidelines have been revised to restrict pets to designated areas, (Prairie Plan 4-31 and 4-33). Regulations and policies pertaining to pets need to be adaptable to respond to specific issues relating to site management. Additionally, the Prairie Supervisor may choose to restrict an activity or require a permit for certain activities if a need arises. This would include dealing with any negative impacts of dogs on resources or other recreational users at Midewin.

#### **PC #: 154**

**Public Concern: The Midewin National Tallgrass Prairie should consider promoting species other than long awned or spear grasses because of potential health threats to dogs.**

“Appendix ‘A.’ In those sections describing native medium and short grass species suggesting *Stipia spartea* as a component may be problematic. This grass as well as other long awned or spear grasses have the potential to be life threatening to dogs in particular when inhaled. They are associated with potentially fatal diseases, *Actinomyces/Nocardia*. Difficult to treat abscesses occur where these spears migrate to the skin surface. Other species such Side Oats should be considered.” (Individual, Harvard, IL - #24)

#### **Agency Response:**

Porcupine Grass (*Stipa spartea*) is an important component of upland prairie habitats, and will be included in planting mixes, where appropriate. The long-awned seeds are present for only a short



period during the growing season (June-early July). Prairie Plan guidelines allow the Prairie Supervisor to restrict pets as needed; such decisions may be made to protect nesting birds, avoid user conflicts or protect the health and safety of visitors (and their pets), (Prairie Plan 4-31, 4-33).

## 12. Roadless Areas and Wilderness

### PC #: 155

#### **Public Concern: The Final EIS should include a substantive evaluation of lands within the planning area suitable for wilderness designation.**

“Where is the roadless evaluation? That is a forest and grassland decision (36 CFR 219.27). I only saw one sentence on page 1-2 on relative size and altered condition. This would not meet the needed analysis because the evaluation should be done according to the Eastern Wilderness Act. There is no size limits in that act. You could have a 10-acre wilderness if you wanted to. And it does call for areas to be considered that have a road density less than 1/2 mile per 1000 acres. . . . What I did find was that there appears to be about 17350 acres in management area 1 (pg 3-1, item (a)), and that your desired condition calls for 12 miles of road (pg 3-5 item (j)). This gives you a road density of .7 miles per 1000 acres, which is close to the requirements for the Eastern Wilderness Act. The mere fact that it is altered is not enough to not consider an area for wilderness. There are plenty of logged over areas in the east (Ellicott Rock Wilderness) that are wilderness. 70% for great Smoky Mountain National Park was logged and now it is considered as wilderness.” (Forest Service Employee, No Address – #26)

#### **Agency Response:**

An Analysis of the Management Situation was completed in 1999, and the resulting determination was made at that early stage of the planning process that no portion of Midewin could be considered undeveloped or suitable as potential wilderness. None of the heavily developed or severely degraded lands transferred from the Army to create Midewin were deemed appropriate for additional roadless analysis, wilderness study, or special designation. Given the widespread presence of closely-spaced railroad beds, a gridded road system, constructed ditches, re-routed streams, agricultural drain tiles, and numerous other cultural features dating from Midewin’s early farming and later Army use, the potential for wilderness was not considered relevant to Midewin.

We continue to believe that it is unfeasible to plan for management of any part of Midewin as wilderness, given not only its limited size and nonconforming use, but its lack of special characteristics and wilderness values, as designated in 36 C.F.R. Part §219.17. As further evaluation for wilderness suitability was determined to be unwarranted, the Final EIS states that “there will be no recommendations to Congress for potential Wilderness areas, or for Wild and Scenic rivers, given the relatively small size and altered condition” (FEIS 1-3).

Current and future planned developments adjacent to Midewin in this semi-rural, but increasingly industrial and residential area are expected to affect conditions for visitors of Midewin, in terms of traffic, sights, smells, and sounds, making a true wilderness experience impossible. However, the existing condition will, nevertheless, slowly give way to the desired condition of restored tallgrass prairie habitat over many decades of restoration work. Future years of restoring prairie habitat must include ongoing, active management, including grazing, prescribed burning, mechanical removal of invasive plant species, planting, and other means not permitted in special designated or wilderness areas. In fact, no portion of Midewin is expected to be untouched by restoration work in the decades to come.

## 13. Socio-economic Conditions

### PC #: 156

#### **Public Concern: The Prairie Plan should include a visitor use goal as a means to evaluate the type and level of resource management actions.**

“The Plan should establish criteria which states an outreach goal in terms of numbers of visitors. This number would be a primary driving force affecting scale of facilities, pace of restoration, and regional educational impact.” (Preservation/Conservation Organization, Chicago, IL – #57)

#### **Agency Response:**

Concurrent with the planning process, the Forest Service is conducting a Marketing Survey to help develop realistic numbers for future visitors. The number of future visitors is not a driving force for the pace of restoration, but rather, limits to public use will be based on the primary need to protect and restore prairie habitat at Midewin. Habitat needs of sensitive species, availability of scarce native seed and plant resources, and budget constraints will be primary factors in the rate at which restoration proceeds. A marketing survey will be conducted before further design of recreational facilities and the visitor center is completed.

### PC #: 157

#### **Public Concern: The Midewin National Tallgrass Prairie should conduct surveys of public user characteristics to better inform social considerations in the planning process.**

“In addition to information collected from multiple sources in the socioeconomic section of the DEIS, the USFS may also want to focus on surveys of visitors to Midewin as public visitation grows. We believe that such surveys would assist in characterizing the social context of the Land and Resource Management Plan. We realize that funding may be limited for this type of activity, but using resources for this purpose is likely to have long-term benefits to Midewin. Appropriate interview and survey questions might address the following: Where do users come from and how far do they travel to get to the prairie? What is the level of auto use to get to the area? What is the level of each user activity (e.g., horseback riding, cycling, hiking, hunting, fishing, motorized vehicles, and sustainable extraction of fruits or plants) and how would the USFS characterize activity impacts on the watersheds, ecology, and sensitive species on the site? Are there cultural affiliations that drive different uses? Where and when does the heaviest use occur for each activity? How will users actually dispose of human waste and other refuse? What is the level of user awareness regarding rules for use? What media outlets do users rely on, so that user outreach, management plan outreach, and NEPA process outreach may reach a broad segment of the population? What percentage of users have access to the world wide web and are aware of the USFS resources there? What other avenues of communication are favored (e.g., email lists, church newsletters, local libraries, schools)?” (U.S. Environmental Protection Agency, Chicago, IL – #61)

#### **Agency Response:**

The Prairie Plan (Appendix E, Research Needs and Opportunities) outlines both broad and specific research needs at Midewin. Several research goals relate to educational and social topics, including effective communication methods, demographics of Midewin visitors, and how recreational activities affect restoration and ecosystem management at Midewin.

Specific social research methods would be developed through research proposals. Research may be conducted at Midewin through Special Use permits by individuals, or through a Memorandum of Understanding or other type of agreement with Research Cooperators. Those

interested in research at Midewin must submit a preliminary proposal to the Prairie Supervisor to be considered. The Forest Service at Midewin does not grant research funds, but does approve of research projects that meet the needs of both Midewin and the researcher, as well as the intent of the Illinois Land Conservation Act which established Midewin and provided, as one of four purposes, for opportunities for scientific, environmental, and land use education and research.

Additionally, we will monitor public use of Midewin, gathering data on types of uses and numbers of users to facilitate planning needs. Surveys of public users may also prove useful to Midewin staff to better serve the needs of visitors.